

APPENDIX E.

**ESTIMATION OF EXPOSURE OF PERSONS IN CALIFORNIA TO PESTICIDE
PRODUCTS THAT CONTAIN ENDOSULFAN**

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By

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TABLE OF CONTENTS

1		
2	ABBREVIATIONS AND ACRONYMS	4
3	ABSTRACT	5
4	INTRODUCTION	6
5	U.S. EPA STATUS	7
6	FORMULATIONS AND USES	8
7	PESTICIDE USE AND SALES	8
8	REPORTED ILLNESSES	9
9	LABEL PRECAUTIONS AND CALIFORNIA REQUIREMENTS	10
10	EXPOSURE SCENARIOS	12
11	Handlers	12
12	Reentry	13
13	Ambient Air, Bystander, and Swimmer	16
14	PHARMACOKINETICS	16
15	Dermal and Inhalation Absorption	16
16	Metabolism	18
17	ENVIRONMENTAL CONCENTRATIONS	21
18	Dislodgeable Foliar Residues	21
19	Air	27
20	Water	32
21	EXPOSURE ASSESSMENT	35
22	Handlers	36
23	Reentry Exposure	51
24	Mitigation Measures Proposed by U.S.EPA	61
25	Ambient Air and Bystander Exposures	62
26	Swimmer Exposures	65
27	EXPOSURE APPRAISAL	66
28	Handler Exposure Estimates	66
29	Reentry Exposure Estimates	71
30	Ambient Air and Bystander Exposure Estimates	72
31	Swimmer Exposure Estimates	73
32	REFERENCES	73
33	APPENDICES	89
34		
35		

ABBREVIATIONS AND ACRONYMS

ADD	absorbed daily dosage
AADD	annual average daily dosage
AI	active ingredient
ARB	California Air Resources Board
CAS No.	Chemical Abstracts Service Number
CCR	California Code of Regulations
CFAC	California Food and Agriculture Code
CFR	Code of Federal Regulations
CFWAP	California Farm Worker Activity Profile
DFR	dislodgeable foliar residue
DPR	California Department of Pesticide Regulation
EAD	exposure assessment document
EC	emulsifiable concentrate
FR	Federal Register
GABA	gamma-amino butyric acid
LADD	lifetime average daily dosage
LOD	limit of detection
LOQ	limit of quantification
M/L	mixer/loader
M/L/A	mixer/loader/applicator
PCO	pest control operator
PHED	Pesticide Handler Exposure Database
PHI	pre-harvest interval
PISP	Pesticide Illness Surveillance Program
PPE	personal protective equipment
PUR	Pesticide Use Report
RED	Reregistration Eligibility Decision
REI	restricted entry interval
SADD	seasonal average daily dosage
STADD	short-term absorbed daily dosage
TAC	toxic air contaminant
TC	transfer coefficient
TWA	time-weighted average
UCL	upper confidence limit
U.S. EPA	U.S. Environmental Protection Agency
WP	wettable powder
WSP	water-soluble packaging

ABSTRACT

This document is included as Volume 2 in the risk characterization document. Endosulfan is a foliar insecticide used in California to control insect pests in a variety of crops. A human exposure assessment for this insecticide was prompted by the observation of acute toxicity effects in a 21-day rat dermal toxicity study. The metabolism and pharmacokinetic information on this insecticide indicates that it is relatively quickly eliminated after oral administration. Metabolites consist of a sulfate and a diol; the diol is oxidized further to species that undergo cyclization. Two endosulfan formulations are registered in California, an emulsifiable concentrate (EC) containing 34% active ingredient (AI), and a wettable powder (WP) containing 50% AI. Both formulations are registered for use on several crops. Endosulfan may be applied by aerial or ground methods; application by any irrigation method is prohibited in California.

Exposure scenarios were identified based on uses listed on product labels. No acceptable chemical-specific exposure data were available. Handler exposures were estimated using surrogate data from the Pesticide Handler Exposure Database; separate dermal and inhalation exposures are provided as well as combined total exposure estimates. Combined short-term absorbed daily dosage (STADD) estimates for mixer/loaders (M/Ls) range from 0.00003 to 2.63 mg/kg/day (for M/Ls handling EC products in support of nursery stock dipping and M/Ls handling WP products in support of aerial applications, respectively). Applicator STADD estimates are 0.790, 0.188, 0.045 and 41.4 mg/kg/day (aerial, airblast, groundboom and nursery stock dipping applications). The STADD estimate for flaggers is 0.373 mg/kg/day. The STADD estimates for mixer/loader/applicators (M/L/As) range from 0.010 to 0.511 mg/kg/day (for M/L/As using low pressure handwand and high pressure handwand, respectively). Seasonal average daily dosage (seasonal ADD) estimates for handlers ranged 0.003 – 0.385 mg/kg/day. Annual ADD estimates ranged 0.0005 – 0.128 mg/kg/day. Lifetime ADD estimates ranged 0.0003 – 0.068 mg/kg/day.

Reentry exposures were estimated using dislodgeable foliar residue data for endosulfan applied to four crops (grape, melon, peach, and lettuce) and transfer coefficients from several studies using surrogate chemicals. STADD estimates range from 0.009 mg/kg/day for workers hand harvesting ornamental plants to 0.533 mg/kg/day for workers hand harvesting sweet corn. Seasonal ADD estimates ranged 0.004 – 0.141 mg/kg/day. Annual ADD estimates ranged 0.001 – 0.047 mg/kg/day. Lifetime ADD estimates ranged 0.0007 – 0.025 mg/kg/day.

Ambient air exposures and bystander exposures during applications were also estimated. Seasonal ADD estimates for ambient air exposures to endosulfan were 0.000019 mg/kg/day for infants and 0.000009 mg/kg/day for adults. Annual ADD ambient air estimates were 0.000011 mg/kg/day for infants and 0.000005 mg/kg/day for adults. Bystander exposure estimates were based on air monitoring done 8.5 – 16.5 m from the edge of an apple orchard during an application. STADD for bystanders is 0.00124 mg/kg/day for infants and 0.000590 mg/kg/day for adults. Seasonal ADD estimates for

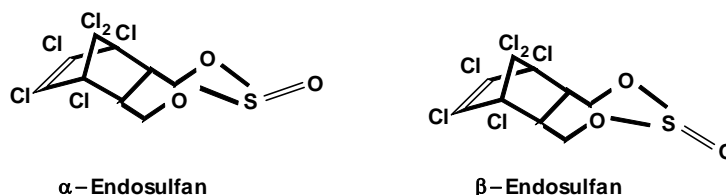
bystander exposures to endosulfan were 0.00046 mg/kg/day for infants and 0.00022 mg/kg/day for adults. Annual ADD estimates for bystanders were 0.000038 mg/kg/day for infants and 0.000018 mg/kg/day for adults.

Exposure estimates for swimmers were based on endosulfan concentrations reported to the California Department of Pesticide Regulation from numerous environmental monitoring studies. STADD for children and adults swimming in California surface waters containing endosulfan are 0.00156 and 0.00027 mg/kg/day, respectively.

INTRODUCTION

Endosulfan is a cyclodiene chlorinated hydrocarbon that was first registered as a pesticide in the United States in 1954. The chemical name of endosulfan is 6,7,8,9,10,10-hexachloro-1,5,5a,6,9,9a-hexahydro-6,9-methano-2,4,3-benzodioxathiepin 3-oxide. Its molecular weight is 406.96; its formula is $C_9H_6Cl_6O_3S$; and its Chemical Abstracts Service Number (CAS No.) is 115-29-7. Endosulfan is a broad-spectrum foliar insecticide and miticide that is used on more than 50 crops in California.

Endosulfan is a colorless, crystalline solid that exists in two isomers, α and β ; these isomers are also referred to as endosulfan-1 and endosulfan-2. The α and β isomers constitute 64-67% and 29-32%, respectively, of the technical mixture. The structures of the endosulfan isomers are shown below:



Each isomer has its own CAS No. assigned; these are 959-98-8 and 33213-65-9 for the α and β isomers, respectively.

Some physical properties of endosulfan are listed below (Sarafin, 1979a; Sarafin, 1979b; Sarafin, 1982; Tomlin, 1994):

Melting point α isomer ($^{\circ}C$)	109.2
Melting point β isomer ($^{\circ}C$)	213.3
Vapor pressure α isomer (mm Hg at $25^{\circ}C$)	1.5×10^{-5}
Vapor pressure β isomer (mm Hg at $25^{\circ}C$)	6.9×10^{-7}
Water solubility α isomer (mg/L at $22^{\circ}C$, pH 5)	0.33
Water solubility β isomer (mg/L at $22^{\circ}C$, pH 5)	0.32
K_{ow} α isomer (at $22^{\circ}C$, pH 5.1)	55,500
K_{ow} β isomer (at $22^{\circ}C$, pH 5.1)	61,400

The log K_{ow} is reported as 4.74 for α -endosulfan and 4.79 for β -endosulfan (Sarafin, 1979b). Sarafin (1982) reported vapor pressure for α -endosulfan and β -endosulfan (listed above), and also for technical endosulfan (purity > 99% for all three test materials) of 1.3×10^{-5} mm Hg at $25^{\circ}C$. Because the volatility of α -endosulfan is so much greater than that

of β -endosulfan, Sutherland *et al.* (2004) suggested that enriching the commercial formulation with β -endosulfan would result in less volatilization of the pesticide. However, β -endosulfan has been shown to isomerize irreversibly to α -endosulfan (Schmidt *et al.*, 2001). The Henry's Law constant, based on data listed above, is 4.2×10^{-5} atm-m³/mole for α -endosulfan and 2.1×10^{-6} atm-m³/mole for β -endosulfan (calculated by the California Department of Pesticide Regulation (DPR) Environmental Chemistry Branch, internal database). Robinson (1987) reported a Henry's Law constant of 1.01×10^{-5} atm-m³/mole, based on water solubility data collected at 20°C.

Endosulfan is toxic to the central nervous system through generalized brain stimulation. The mode of action of endosulfan is to bind and inhibit γ -amino butyric acid (GABA)-gated chloride channel receptor and thereby inhibiting GABA-induced chloride flux across membranes (Abalis *et al.*, 1986; French-Constant, 1993; Sutherland *et al.*, 2004). The effects on the GABA receptor complex are similar to those of lindane, dieldrin and endrin (Lawrence and Casida, 1984; Casida and Lawrence, 1985; Cole and Casida, 1986). Neurotoxicity has also been attributed to other actions such as an inhibition of the calmodulin dependent Ca⁺² ATPase activity (Srikanth, *et al.*, 1989) and alterations in the serotonergic system (Agrawal *et al.*, 1983).

Endosulfan is being evaluated in accordance with the California Food and Agriculture Code (CFAC), Section 12824 and the Birth Defect Prevention Act of 1984 (CFAC, Sections 13121-13135), based on adverse effects reported in laboratory animal toxicity studies. Reported effects included neurotoxicity, reproductive effects, vascular effects, and effects on kidneys (Silva, 2004). This Exposure Assessment Document (EAD) is the first prepared by DPR for endosulfan.

U.S. EPA STATUS

The U.S. Environmental Protection Agency (U.S. EPA) has assigned endosulfan to Toxicity Category I for oral, Toxicity Category II for inhalation, and Toxicity Category III for dermal exposure (U.S. EPA, 2002a). U.S. EPA (2002a) considers endosulfan to be an eye irritant (Toxicity Category I), but not a dermal irritant or sensitizer.

A Reregistration Eligibility Decision (RED) for endosulfan was issued by U.S. EPA in 2002. In the absence of sufficient data suggesting otherwise, the RED assumed that endosulfan did not share a common mechanism of toxicity with any other active ingredient (AI). The RED stated several human health and ecological risk concerns, including both handler and reentry occupational exposures, and suggested measures to mitigate each (U.S. EPA, 2002a). These measures, and the predicted effects on exposure estimates, are discussed in this EAD. Exposure estimates were not given in the RED; a document released previously presented exposure calculations (U.S. EPA, 2002b). Information and conclusions from U.S. EPA (2002a; 2002b) were considered by DPR during the preparation of this EAD. However, exposure scenarios considered by DPR differed somewhat from those considered by U.S. EPA. Additionally, several assumptions used in exposure assessments differed between DPR and U.S. EPA. Such differences are discussed in this EAD when appropriate.

FORMULATIONS AND USES

As of September 2006, two formulations were registered in California, an emulsifiable concentrate (EC) containing 34% AI (two products), and a wettable powder (WP) containing 50% AI (three products). The EC formulation contains 3 lbs AI/gallon (0.36 kg AI/L). Both formulations are registered for use on several crops, all of which are listed in Appendix 1. Endosulfan may be applied by aerial or ground methods; application by any irrigation method is prohibited in California.

PESTICIDE USE AND SALES

California requires reporting of all agricultural uses of pesticides, as well as other uses when pesticides are applied by a licensed applicator. These data are collected in the Pesticide Use Report (PUR) database. Table 1 summarizes PUR data for the crops on which most endosulfan use occurred in 2000 – 2004, the most recent 5 years for which these data are available. The greatest use was in cotton, lettuce, and tomatoes; together these crops accounted for about 78% of endosulfan use in 2004. In 2004, there were 180,272,161 pounds of pesticide active ingredients reported used in California (DPR, 2006a). Overall, of the pesticide use reported to DPR in 2004, endosulfan accounted for 153,339 lbs, or 0.085%.

Endosulfan use on cotton was greater in 2001 – 2004 than in 2000. The increase was attributed mostly to whitefly and aphid control near the end of the growing season (DPR, 2003). These insects produce sugary excretions, fouling cotton lint in a condition called “sticky cotton.” A major outbreak of these pests triggered increased endosulfan use in 2001, followed by aggressive control in 2002 to prevent a recurrence. In contrast, endosulfan use has decreased on alfalfa. On February 13, 1997, U.S. EPA published a notice in the Federal Register (FR), Volume 62, announcing receipt of requests to delete endosulfan uses on several crops, including alfalfa grown for forage (62 FR 6776-6777). The only remaining use on alfalfa is on alfalfa grown for seed; that use was deleted as of February 2006 (70 FR 48398-48413).

California collects a fee for all pesticides sold in the state (Mill Assessment sales data). In 2004, the most recent year for which Mill Assessment sales data are available, a total of 190,654 lbs of endosulfan was sold in California, compared to a total of 704,898,069 lbs of all AIs (DPR, 2005b). Thus, endosulfan accounted for about 0.03% of pesticide sales in 2004. For many reasons, the amount of endosulfan (or of any AI) sold in a single year would not be anticipated to equal the amount used. For example, pesticides sold in one year may be used in a different year or over multiple years, or might remain in storage or be discarded. Between 2000 and 2004, annual sales of endosulfan ranged from 171,503 lbs sold in 2003 to 190,654 lbs sold in 2004; an average of 180,498 lbs was sold during the 5-year interval. In contrast, average endosulfan use reported during the interval was 147,298 lbs.

1 **Table 1. Use of Endosulfan by Crop for 2000- 2004 ^a**

Crop	Pounds Applied				
	2000	2001	2002	2003	2004 ^b
Cotton	14,136	44,281	66,837	58,101	76,638 (50.0)
Lettuce	22,649	26,758	22,293	19,549	21,865 (14.3)
Tomatoes (all types)	23,839	21,733	16,143	23,522	20,803 (13.6)
Cucurbits ^c	16,046	16,868	14,295	11,274	12,216 (8.0)
Alfalfa	53,166	25,758	10,198	12,334	9,595 (6.3)
Peppers	1,178	3,248	354	1,248	4,042 (2.6)
Crucifers ^d	2,043	4,275	3,289	3,847	4,012 (2.6)
Potato	576	686	3,264	470	1,324 (0.9)
Tree Nuts ^e	580	557	250	82	849 (0.6)
Grapes (all types)	3,995	4,413	3,160	272	497 (0.3)
Stone Fruit ^f	2,018	1,691	3,294	495	457 (0.3)
Sweet Corn	334	428	1,839	319	274 (0.2)
Sugar Beets	1,649	332	2,607	0	252 (0.2)
Pome Fruit ^g	1,039	90	344	591	102 (0.1)
Beans	463	876	1,795	512	6 (0.0)
Citrus ^h	176	0	56	0	0 (0.0)
Total of listed crops	143,887	151,976	150,018	132,616	152,932
Total in PUR ⁱ	144,619	153,498	150,954	134,080	153,339
Listed crops % of total	99.5%	99.0%	99.4%	98.9%	99.7%
^a From DPR (2001; 2002; 2003; 2005a; 2006a). Arranged in descending order by use in 2004. Multiply values by 0.455 to get use in kg applied. ^b Number in parentheses is percent of total endosulfan use in 2004. ^c Includes cucumbers, melons, pumpkins, squash, summer squash, winter squash and watermelon. ^d Includes broccoli, Brussels sprouts, cabbage, cauliflower, and Chinese cabbage. ^e Includes almonds, pecans and walnuts. ^f Includes apricots, cherries, nectarines, peaches, plums and prunes. ^g Includes apples and pears. ^h Includes oranges. No use reported on other citrus fruit. ⁱ PUR = Pesticide Use Report (DPR, 2001; 2002; 2003; 2005a; 2006a).					

2

3

REPORTED ILLNESSES

4 Reports of illness and injury with definite, probable, or possible exposure to pesticide
5 products are recorded in a database maintained by the Pesticide Illness Surveillance
6 Program (PISP) at DPR. The PISP database contains information about the nature of the
7 pesticide exposure and the subsequent illness or injury. In California between 1992 and
8 2004, 63 illnesses were reported to the Pesticide Illness Surveillance Program that
9 suggested the involvement of endosulfan, alone or in combination with other pesticides
10 (Verder-Carlos, 2006). Of the 63 illnesses, 61 resulted from agricultural applications and
11 just two from non-agricultural applications. Five agriculturally-related and both of the
12 non-agriculturally-related illnesses and injuries were attributed solely to endosulfan; the
13 other 56 reports were associated with endosulfan in combination with other pesticides.

14

Of the seven illnesses and injuries attributed solely to endosulfan, one occurred as the result of exposure to field residues, three resulted from handling processes (mix/load, apply), two resulted from drift, and one followed a non-specified exposure. Of the 56 illnesses resulting from exposure to endosulfan in combination with other pesticides, 43 occurred as the result of exposure to residue, six occurred during the application process (mix/load, apply, flag), and seven occurred as the result of drift exposure.

Table 2 summarizes types of symptoms reported in association with endosulfan exposure. The majority of illnesses involved skin and eye effects, such as irritation and rashes. Several incidents involved more than one worker. None of the incidents resulting in multiple exposure involved endosulfan as the only pesticide. Of the 44 field worker illnesses and injuries, 31 (70%) harvesting cucurbits (melons, cucumbers), and seven (16%) occurred while working in grapes. The remaining six (14%) occurred in various other crops.

Table 2. Illnesses Reported in California Associated with Endosulfan Exposure (1992-2004) ^a

Systemic ^b	Skin	Eye	Systemic/ Skin	Systemic/ Eye	Skin/Eye	Systemic/ Skin/Eye	Total
<u>Endosulfan alone</u>							
2	1	0	0	0	2	2	7
<u>Endosulfan with other pesticides</u>							
14	23	2	7	1	4	5	56
<u>Total</u>							
16	24	2	7	1	6	7	63
^a This table summarizes types of symptoms reported, and includes illnesses possibly, probably or definitely associated with endosulfan exposure. “Definite” means that both physical and medical evidence document exposure and consequent health effects, “probable” means that circumstantial evidence supports a relationship to pesticide exposure, and “possible” means that evidence neither supports nor contradicts a relationship (Verder-Carlos, 2006). ^b Systemic illnesses include symptoms such as shortness of breath, nausea, dizziness, headache and numbness.							

In the southeastern U.S., two incidents were reported in which mixer/loader/applicators (M/L/As) pouring endosulfan without proper protective equipment experienced serious illnesses (Brandt *et al.*, 2001). Prolonged exposure to endosulfan splashed onto the skin was believed to have resulted in long-term neurological damage in one case, and in death in the other case.

LABEL PRECAUTIONS AND CALIFORNIA REQUIREMENTS

Endosulfan formulations all have the signal word DANGER-POISON on the label. The following is representative of precautionary statements, taken from a WP product (Gowan Endosulfan 50W):

1 “Fatal if swallowed. May be fatal if inhaled or absorbed through skin. Causes moderate
2 eye irritation. Avoid contact with skin, eyes, or clothing. Do not breathe vapors, dust or
3 spray. Do not apply or allow to drift to areas occupied by unprotected humans or
4 beneficial animals.”

5
6 “Applicators and other handlers must wear:

- 7 • Coveralls over long-sleeved shirt and long pants
- 8 • Chemical-resistant footwear plus socks
- 9 • Waterproof gloves
- 10 • Protective eye wear
- 11 • Chemical-resistant head gear for overhead exposure
- 12 • Chemical-resistant apron when cleaning equipment, mixing or loading
- 13 • A respirator with either an organic vapor-removing cartridge with a prefilter
14 approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a
15 canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).”

16
17 California has an additional requirement for use of protective eyewear during the
18 following activities (exceptions are provided for some of the activities meeting specified
19 criteria): mixing or loading pesticides; cleaning, adjusting, or repairing equipment that
20 contains pesticides in hoppers, tanks or lines; pesticide applications by hand; ground
21 applications of pesticides; and flagging (Title 3 Code of California Regulations (3 CCR),
22 Section 6738). In California, all products containing endosulfan are classified as
23 Restricted Materials (3 CCR 6400), due to toxicity to fish and other aquatic organisms
24 (Rutz, 1997).

25
26 California regulations require the use of closed mixing and loading systems for liquid
27 formulations of toxicity category I pesticides and closed loading systems for liquid
28 mixtures of toxicity category I dry formulations (3 CCR 6746). Thus, all formulations of
29 endosulfan require the use of closed systems for loading, and EC formulations also require
30 closed systems during mixing. Many of the WP products are packaged in water-soluble
31 packaging (WSP), which is considered to be a closed system. U.S. EPA proposed
32 requiring all WP endosulfan products to be packaged in WSP to mitigate handler exposure
33 (U.S. EPA, 2002a). As of September 2006, there are still products sold in California that
34 are not in WSP. Therefore, all handlers of liquids were assumed to mix/load using a
35 closed system, and handlers of WP products were assumed to either be handling WSP or
36 to be openly pouring WP.

37
38 Handlers mixing/loading using a closed system are allowed by federal and state law to
39 substitute alternate personal protective equipment (PPE) for that listed on product labels.
40 Under the federal Worker Protection Standard (Title 40 Code of Federal Regulations (40
41 CFR), Section 170.240), “Persons using a closed system to mix or load pesticides with a
42 signal word of DANGER or WARNING may substitute a long-sleeved shirt, long pants,
43 shoes, socks, chemical-resistant apron, and any protective gloves specified on the labeling
44 for handlers for the labeling-specified personal protective equipment.” Additionally,
45 “Persons using a closed system that operates under pressure shall wear protective
46 eyewear.”

The corresponding California regulations have more restrictive PPE requirements (3 CCR 6738): “Persons using a closed system to handle pesticide products with the signal word ‘DANGER’ or ‘WARNING’ may substitute coveralls, chemical resistant gloves, and a chemical resistant apron for personal protective equipment required by pesticide product labeling.” Also, “Persons using a closed system that operates under positive pressure shall wear protective eyewear in addition to the personal protective equipment listed...Persons using any closed system shall have all personal protective equipment required by pesticide product labeling immediately available for use in an emergency.” The substituted PPE required in California allows workers mixing and loading with a closed system to work without respirators.

According to requirements listed on product labels, the restricted entry interval (REI) is 24 hours for all activities in all crops. The REI is set by California regulations to 2 days for all crops treated with endosulfan (3 CCR 6772). Early reentry into a treated field is permitted only if workers either have no contact with treated foliage, or meet specific requirements of 40 CFR 170.112 and 3 CCR 6770. Pre-harvest intervals (PHIs) for crops treated with endosulfan range from 0 to 21 days (see Appendix 1).

EXPOSURE SCENARIOS

An exposure scenario describes a situation where people may contact pesticides or pesticide residues, and in which the nature of the exposure as well as its magnitude (apart from variability among individuals and occasions) is relatively homogeneous. Only agricultural uses are allowed for endosulfan; therefore, all exposure scenarios take place during or following agricultural applications. Workers can potentially be exposed to endosulfan during handling activities and during reentry into treated fields. In addition, available data suggest that bystander exposures are possible to individuals who are next to fields during or following endosulfan applications, and that airborne endosulfan exposures are possible in areas that are far from application sites (ambient air exposure). Endosulfan residues have been detected in surface waters in California, suggesting that exposures are possible to individuals swimming in surface waters draining agricultural lands (swimmer exposure).

Handlers

Table 3 lists handling scenarios for endosulfan, based uses listed on product labels. Handler activities include M/L, applicator, M/L/A, and flagger. Flaggers may be used to assist aerial applicators, although use of human flaggers is becoming increasingly rare as newer technologies are adopted. Handlers may be growers or custom applicators; custom applicators may treat crops for many different growers (Haskell, 1998).

For the purposes of this exposure assessment, handler exposures are assumed to be generally independent of crop, and to be dependent upon formulation, application method, and amount handled. Separate M/L exposure scenarios were assessed for each application method and formulation (Table 3). Because the WP formulation is mixed with water and applied as a liquid all applicator exposure estimates assume application of a liquid.

1 **Reentry**

2 Reentry scenarios considered in this EAD are shown in Appendix 1. Crops on which
 3 endosulfan is registered in California are listed in Appendix 1, along with reentry
 4 scenarios expected to occur in each. Also, the maximum application rate allowed for each
 5 use site, and the shortest pre-harvest interval (PHI) for each crop, are given in Appendix
 6 1. PHI generally determines the earliest post-application day a crop is harvested, and is
 7 therefore considered in estimating harvester exposures. Unlike REIs, however, PHIs are
 8 set according to pesticide residues on crops rather than worker safety, and are subject to
 9 change. If a PHI is changed, the impact of that change on reentry exposure should be
 10 considered.

11
 12 **Table 3. Handler Exposure Scenarios for Endosulfan ^a**

Activity	Formulation Type	
	Emulsifiable Concentrate ^b	Wettable Powder ^c
Aerial M/L ^d	x	x
Aerial Applicator	x	
Flagger	x	
Airblast M/L ^d	x	x
Airblast Applicator	x	
Airblast M/L/A ^d	x	x
Groundboom M/L	x	x
Groundboom Applicator	x	
Groundboom M/L/A	x	x
Low Pressure Handwand M/L/A	x	x
Backpack M/L/A	x	x
High Pressure Handwand M/L/A	x	x
Nursery Stock Dip/Drench M/L/A	x	x
^a Based on product labels registered by DPR. ^b Emulsifiable concentrate is diluted before use. ^c Some products are packaged in water soluble packaging (WSP); separate M/L scenarios are needed for products in WSP and products not in WSP. ^d M/L is mixer/loader. M/L/A is mixer/loader/applicator.		

13
 14 Reentry activity information was obtained from several sources, including the California
 15 Farm Worker Activity Profile (CFWAP; Edmiston *et al.*, 1999), a survey of growers in
 16 California and surrounding states (Thompson, 1998), crop profiles published by the
 17 University of California (UCCE, 2004; VRIC, 2004), and consultation with scientists
 18 from DPR's Exposure Monitoring Program. Reentry activities include irrigating,
 19 scouting, thinning, pruning, weeding, roguing, transplanting, staking/tying, swathing, and
 20 harvesting. Irrigators may move pipes by hand in some systems, or may inspect and
 21 maintain equipment in fields. Scouts walk through fields examining leaves and other
 22 plant parts for evidence of pests or damage caused by pests. Thinning involves removal
 23 of immature fruit or plants; fruit is often thinned by hand, and crops such as lettuce and
 24 cabbage are thinned using hoes to remove excess young plants. Pruning is removal of
 25 branches and stems; depending on the crop, pruning may involve minimal or substantial

1 contact with foliage (heavy gloves are usually worn while pruning, in contrast to
2 thinning). Hand weeding may be done using hoes or by pulling individual plants.
3 Roguing in cotton is removal of cotton plants that are diseased or defective, and may also
4 be done by hand. Transplanting of young plants is done in apples, pears, and several
5 vegetable crops if initially planted in greenhouses or nurseries. Staking and tying in
6 tomatoes are done to keep fruit off the ground, and may be done intermittently as plants
7 grow. Swathing in crops such as barley is done mechanically, and involves cutting plants
8 and leaving them in windrows to dry before harvest. Harvesting is typically done
9 mechanically in field crops, including barley and cotton; hand harvesting is done in crops,
10 especially fruits, vegetables, and sweet corn, where product appearance is important.
11 Fresh market tomatoes are hand harvested, while tomatoes for canning or processing into
12 paste are harvested mechanically.

13
14 Endosulfan is registered for use on numerous crops, and many reentry activities are
15 possible in each crop. It would be desirable to have exposure estimates for each of these
16 crop/activity combinations (scenarios). However, little information is available for many
17 scenarios, and several scenarios are likely to result in similar exposures. For these
18 reasons, representative reentry exposure scenarios were selected based on available
19 information about the extent of foliar contact for each activity, and the resulting potential
20 for residue transfer. Residue transfer is discussed in the Exposure Assessment section.

21
22 Representative scenarios were determined by first grouping crops, then by selecting
23 activities within each group that would be anticipated to have the highest potential for
24 exposure. Crops were grouped by growth form (e.g., tree) and by similar cultural
25 practices. For example, pome and stone fruit crops were grouped together, as were tree
26 nut crops. Field crops such as cotton and barley were considered together. Lettuce and
27 other leafy vegetables that grow close to the ground were assessed as a group. Tomatoes,
28 eggplants and peppers, which bear fruit above ground, were considered together, as were
29 crops such as potatoes, carrots, and sugar beets, which are underground. Strawberries and
30 pineapples were grouped together, because their plants are fairly short and the fruit is
31 harvested by hand. Crop groups are summarized in Table 4.

32
33 Once crops were grouped, representative activities were selected for each group; these are
34 shown in Table 5. In Appendix 1, reentry activities listed for each site were assigned to
35 tiers, using the following definitions based on anticipated exposure:

- 36
37
- Tier I: Most of the body is in contact with residues.
 - 38 • Tier II: Some of the body is in contact with residues (e.g., hands, arms and face; or
39 hands, forearms, feet, and lower legs).
 - 40 • Tier III: Very little of the body is in contact with residues (e.g., hands only; or
41 hands and feet only).

42 Available information about crops or groups of crops was used to determine the
43 representative activities in Tier I and Tier II. Within each use site, suggested
44 representative reentry scenarios are indicated in bold in the “Tier I Activities” and “Tier II
45 Activities” columns in Appendix 1.

1 **Table 4. Crop Groups Used for Selecting Representative Scenarios^a**

Category ^b	Representative Crop	Crops Included
FC	Cotton	Barley, Oats, Rye, Sunflower, Safflower, Wheat
FC	Corn, Sweet	Tobacco
FN	Almond	Filbert, Macadamia Nut, Pecan, Walnut
FN	Citrus	Orange, etc. (Non-bearing trees and nursery stock)
FN	Grape	(no other crops in group)
FN	Peach	Apple, Apricot, Cherry, Nectarine, Pear, Prune, Plum
FN	Strawberry	Pineapple
OT	Cut Flowers	Greenhouse Ornamentals
OT	Ornamental Plants	Nursery Stock, Trees, Shrubs
V	Broccoli	Brussels Sprouts, Cabbage, Cauliflower, Chinese Cabbage (Bok Choy), Dried Beans, Succulent Beans, Peas
V	Cucumber	Melons, Pumpkin, Summer Squash, Winter Squash
V	Lettuce	Celery, Collards, Head Lettuce, Kale, Leaf Lettuce, Mustard Greens, Spinach, Kohlrabi
V	Potato	Carrot, Sugar Beet, Sweet Potato (root vegetables)
V	Tomato	Eggplant, Peppers
^a Crops listed in Appendix 1.		
^b FC = Field Crops; FN = Fruits and Nuts; OT = Ornamentals, Nursery/Greenhouse; V = Vegetables.		

2
3 Scenarios grouped under a representative scenario are not all expected to have identical
4 exposures; however, the representative scenario is anticipated to involve exposures
5 similar to or greater than all scenarios covered by it. In other words, representative
6 scenarios might overestimate exposure for other scenarios, but should not underestimate
7 exposure. For example, cotton scouting is the representative scenario that covers all
8 activities in alfalfa, barley, clover, oats, rye, safflower, sunflower, and wheat. Because of
9 the height and foliar density of cotton as it matures, reentry into a treated field is likely to
10 result in more exposure than reentry in alfalfa or most other field crops (except corn and
11 tobacco, which are covered by another scenario). Additionally, many activities in these
12 crops, such as irrigating or mechanical harvesting, would be anticipated to result in lower
13 exposures per full workday than cotton scouts (see the Exposure Assessment section for
14 an explanation of how reentry worker exposures are estimated).

15
16 For crops where the PHI is 0, 1, or 2 days, harvesting is the only representative activity
17 assessed (under California law, REI is 2 days for all activities, including harvesting). If
18 the PHI is longer than 2 days, a second activity is also included (e.g., thinning, pruning,
19 staking/tying, or scouting), to ensure that the scenario having the highest exposure
20 estimate is assessed. For most crops, hand harvesting, the activity having the greatest
21 contact with treated foliage, can result in the highest exposure potential. However, if
22 harvesting occurs several days after treatment (as required by longer PHI), then less foliar
23 residue is available for transfer, which results in a lower exposure.

1 **Table 5. Representative Reentry Scenarios for Endosulfan**

Crop ^a	Rate ^b	Activity ^c	Represents ^d
Almond	2.5	Thinning (REI)	Tree nuts; all activities
Broccoli	1.0	Hand Harvest (PHI: 4)	Broccoli, etc.; all activities except scouting
Broccoli	1.0	Scouting (REI)	Broccoli, etc.; scouting
Citrus	2.5	Thinning (REI)	All activities in citrus; non-bearing trees only
Corn, Sweet	1.5	Hand Harvest (REI)	Sweet corn and tobacco; all activities
Cotton	1.5	Scouting (REI)	All field crops except sweet corn and tobacco; all activities
Cucumber	1.0	Hand Harvest (REI)	All melons, pumpkins, squash; all activities
Cut Flowers	1.0 ^e	Hand Harvest (REI)	All greenhouse plants; all activities
Grape	1.5	Cane Turning (REI)	All grapes; all activities
Lettuce	1.0	Scouting (REI)	Celery, etc.; all activities
Ornamental Plants	1.0 ^e	Hand Harvest (REI)	All nursery and container-grown ornamental plants; all activities
Peach	2.5	Thinning (REI)	Pome and stone fruits; all activities
Potato	1.0	Scouting (REI)	All root vegetables; all activities
Strawberry	2.0	Hand Harvest (REI)	All activities in strawberry
Tomato	1.0	Hand Harvest (REI)	Eggplant, peppers; all activities
^a Representative crops from Table 4.			
^b Maximum application rate allowed on crop in pounds of active ingredient per acre (lbs AI/acre). Multiply value by 1.12 to get application rate in kg AI/ha.			
^c PHI: Pre-harvest Interval; number of days. REI: Restricted Entry Interval; REI is 2 days for all crops. In cases where PHI is 2 days or less, exposure is estimated at the expiration of the REI. In cases where the PHI is longer than 2 days, a second activity is also included to ensure that the scenario having the highest exposure estimate is assessed.			
^d All scenarios covered by the representative crop and activity are anticipated to have exposure equivalent or less than that of the representative scenario. See Table 4 for specific crops covered by each scenario.			
^e Maximum application rate for drench of ornamental plants is 1.0 lb/100 gallons (5.8 g/L).			

2

3 ***Ambient Air, Bystander, and Swimmer***

4 Representative scenarios for ambient air and bystander exposures include infants and
5 adults. Representative scenarios for swimmer exposures include children and adults.
6 Infants or children are included as potential worst-case scenarios, and exposure estimates
7 are included for adults to allow comparison with other types of scenarios.

8

PHARMACOKINETICS9 ***Dermal and Inhalation Absorption***10 Dermal Absorption

11 Two dermal absorption studies, conducted on rats and monkeys, are available for
12 endosulfan (Lachman, 1987; Craine, 1988). Dermal absorption of endosulfan in a 3-EC
13 formulation was assessed in female CD rats at doses of 0.1, 1.0 and 10 mg/kg (Craine,
14 1988). These treatment levels, when applied to a 10.8-cm² area of shaved dorsal surface,

provided doses of approximately 0.037, 0.37 and 3.7 mg/cm², respectively. The specific activity (total amount of radioactivity per unit mass) of the ¹⁴C-endosulfan in the dosing solutions was either 5.47 or 27.2 microcuries/mg (μCi/mg; a microcurie equals 2.22 x 10⁶ disintegrations per minute), and the radiopurity was 94.6%. The ¹⁴C-label was located at the 5a- and 9a-carbon positions. There were 16 rats per dose level and the rats were held for 10 hrs after dosing, at which time the treated area was washed with soapy water. Animals were sacrificed at 24, 48, 72 and 168 hrs post-treatment. Radioactivities in duplicate samples, including skin at the application site, carcass and excreta (urine and feces) were quantified with liquid scintillation counting analysis, and specific activity in each sample was related to the specific of the appropriate dosing solution to determine percent recovery. The total percent recovery of the ¹⁴C-radiolabel in the excreta, carcass, and application site at each sacrifice time period is considered to be equivalent the percent dermal absorption, as the amount recovered from the application site was considered to be potentially available for absorption. The data at the 168-hr period for the three doses are summarized in Table 6. These data were used for the derivation of a dermal penetration value, which was used to estimate worker exposure.

The decline of the amount of ¹⁴C-endosulfan recovered from the application site, along with concomitant increases in residues in excreta, represents bound skin bioavailability. At 24 hrs in the low dose animals, the amount in the skin represented 41.4% of the applied dose, and this declined to 23.8 and 7.0%, respectively, at the 48-and 72-hr sacrifice time periods. This type of decline in the amount bound to the skin was also observed for the two higher treatment levels. In the present exposure assessment, the mean percent of the two lowest doses (47.3%) was used for estimating absorbed dosages, as it approximates the level of exposure experienced by workers handling or exposed to endosulfan. The percent dose recovered for these two doses averaged 95%; adjustment of the dermal absorption estimate for recovery was considered unnecessary.

Table 6. Dermal Penetration of ¹⁴C-Endosulfan in Rats After 168 Hours ^a

	<u>Applied Dose (mg/cm²)</u>		
	0.037	0.37	3.7
<u>Matrix:</u>	<u>Percent of Applied Dose</u>		
a) Site Wash	28.0	46.8	68.6
b) Paper Cover, Rubber Ring, Skin Wash ^b	11.9	7.9	3.2
c) Application Site	1.7	1.5	1.0
Excreta (Urine, Feces)	42.3	44.2	19.0
Carcass	2.5	2.3	1.4
% Penetrated ^c	46.5	48.0	21.4
% Dose Recovered (a + b + c)	86.4	102.7	93.2
^a Data from Craine (1988).			
^b Paper cover and rubber ring protected application site. Also includes amount rinsed from skin adjacent to application site.			
^c Sum of urine, feces, application site, and carcass (values bolded). The dermal absorption estimate used in the exposure assessment is the mean penetration of the two lowest doses: (46.5 + 48.0)/2 = 47.3%.			

A pharmacokinetic study in two male rhesus monkeys after dermal dosing with Thiodan[®] EC was performed in order to identify potential urinary metabolites for use in a worker exposure study (Lachman, 1987). Only 1.9% of the applied dose was found to be the diol, which limits its use as a biomarker for exposure. As the material balance for this study was very poor (50% of applied dose recovered), these data were not used to estimate absorbed doses.

Inhalation Absorption

No inhalation data are available for endosulfan. In the absence of data, DPR uses a default inhalation absorption value of 100%.

Metabolism

Most animal metabolism data for endosulfan are not contemporary, and with the exception of one study (Chan *et al.*, 2005), animal metabolism studies predated Good Laboratory Practice (GLP) standards. However, the older studies help provide sufficient information to allow an adequate characterization of the pharmacokinetic and metabolic profile of this insecticide in animals. The most comprehensive metabolism study of endosulfan was reported by Dorough *et al.* (1978). They examined the fate of ¹⁴C-endosulfan in rats after a single-oral dose and after feeding endosulfan in the diet for two weeks. The two-week dietary study was not used for exposure assessment in the present document.

Single Oral Dose – Metabolites in Rats

Female rats (number not specified, some bile cannulated) weighing 200-250 g were orally dosed with either α - or β -¹⁴C-endosulfan (specific activity 0.98 mCi/mmol; radiopurity not specified) in corn oil at 2 mg/kg (Dorough *et al.*, 1978). This dose was approximately 2×10^6 dpm/rat. The animals were held in metabolism cages for 5 days to collect urine and feces. Chloroform was the solvent used for feces extraction while diethyl ether was used to extract endosulfan metabolites from bile and urine. Following these extractions, urine samples were treated with β -glucuronidase to release conjugated metabolites. The metabolites were characterized by co-chromatography with standards in three solvent systems. The ¹⁴C-material balances after five days for α - and β -endosulfan were 88.0 and 86.8%, respectively. The primary route of excretion was the feces with 74.8 and 68.3% α - and β -endosulfan, respectively. Table 7 contains the metabolic profile in feces, urine and bile after oral administration of α - and β -endosulfan. The structures of these metabolites are shown in Figure 1.

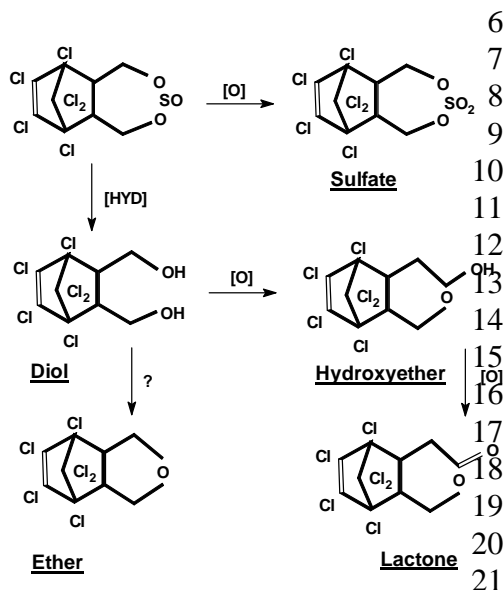
The number of metabolites in feces and urine demonstrates the lability of α - and β -endosulfan. The tissue levels in the kidney and liver of animals treated with α -endosulfan were 1.66 and 0.35 ppm, respectively. For animals treated with β -endosulfan, the tissue levels in the kidney and liver were 1.13 and 0.22 ppm, respectively. The combined liver and kidney tissue levels represented about 1.5% of the applied dose. Because the specific activity was low, residues in other tissues were not analyzed after this single oral dose. Additionally, no attempt was made to monitor ¹⁴CO₂, to determine whether endosulfan was metabolized to CO₂.

Table 7. Metabolites in Urine, Feces and Bile after a Single Oral Dose of α - or β - ^{14}C -Endosulfan at 2.0 mg/kg to Female Rats ^a

Metabolite	Percent of Administered Dose ^b					
	Feces ^c		Urine ^d		Bile ^d	
	α	β	α	β	α	β
Origin (polar metabolites)	1.7	1.9	19.4	16.5	32.3	18.8
Endosulfan diol	5.3	4.1	9.1	6.4	1.3	1.0
α -Hydroxy ether	4.5	2.1	5.6	5.6	3.4	4.0
Endosulfan lactone	1.1	1.1	5.8	3.4	5.0	9.7
Endosulfan sulfate	0.3	1.2	0.0	0.0	0.0	0.0
β -Endosulfan	0.1	7.0	0.0	0.0	0.0	0.0
Endosulfan ether	0.1	0.4	0.0	0.0	0.0	0.0
α -Endosulfan	2.1	-	0.1	-	0.0	0.0

^a Dorough *et al.* (1978). Analyzed by thin-layer chromatography.
^b Values were not corrected for total recovery, nor was $^{14}\text{CO}_2$ monitored in this study.
^c Extracted with chloroform.
^d Extracted with diethyl ether.

Figure 1. Metabolic Products of Endosulfan



Pharmacokinetics After Oral Administration to Rats

Chan *et al.* (2005) examined the pharmacokinetics in male Sprague-Dawley rats after a single oral dose or up to three doses of ^{14}C -endosulfan (specific activity 51.3 $\mu\text{Ci}/\text{mg}$; 7:3 α - to β -isomer ratio). Groups of three 28-day-old animals were given doses of 5.0 mg/kg in olive oil by oral gavage. Six groups of animals received one dose (animals receiving repeated doses are not discussed here), and radioactivity was quantified with liquid scintillation counting analysis in blood and tissue samples for up to 4 days post-dose. In blood, the maximum concentrations occurred 2 hrs post-dose and the elimination half-life was 193 hrs. After 8 hrs, the highest amounts of radioactivity were found in liver and kidneys. The pharmacokinetics were fit by a two compartment model. Most of the

1 radioactivity was excreted via urine ($12.4\% \pm 4.8\%$) and feces ($94.4\% \pm 21.4\%$), with
2 excretion nearly complete after 48 hrs.

3 Pharmacokinetics After Intravenous Administration to Rabbits

4 Gupta and Ehrnebo (1979) examined the pharmacokinetics in rabbits after intravenous
5 injection of endosulfan with a 7:3 α - to β -isomer ratio. Six female, albino rabbits (1.7-2.0
6 kg) were given 2.0 mg/kg, in peanut oil, through a cannulated femoral vein. Blood levels
7 were monitored for 5 days post-administration. The blood concentration half-lives for α -
8 and β -endosulfan were 235 ± 168 hrs and 5.97 ± 2.41 hrs, respectively. The total
9 distribution volumes for the α - and β -isomers were found to be 675 ± 246 ml and $565 \pm$
10 126 ml, respectively. The pharmacokinetics were best fit by a three compartment model
11 for the α -isomer and a two compartment model for the β -isomer. For the administered α -
12 isomer, unmetabolized endosulfan was found to be 2.7% in the urine and 11% in the
13 feces. For the β -isomer, the urine and feces contained 0.4% and 37%, unmetabolized
14 endosulfan, respectively.

15 Biomonitoring of Humans

16 Limited information on excretion of endosulfan and metabolites by exposed workers was
17 obtained from urinary samples analyzed by gas chromatography–tandem mass
18 spectrometry (Martinez Vidal *et al.*, 1998), using a method adapted for human serum that
19 was fully described in a subsequent study by Arrebola *et al.* (2001). To validate the
20 analytical method, urine and blood samples were collected from nine pest control
21 operators (PCOs) in Spain. Four of the PCOs had applied pesticides the previous day, and
22 five, the previous week. All applications lasted 2-5 hrs. Self-reported working conditions
23 indicated lack of protective overalls, breathing masks, or gloves. Endosulfan and
24 metabolites (endosulfan ether and endosulfan lactone) were detected in urine from all four
25 PCOs who applied pesticides the previous day. In these four samples, α -endosulfan
26 concentrations ranged from 787 to 894 pg/ml, and β -endosulfan concentrations ranged
27 from 801 to 896 pg/ml. Endosulfan and metabolites (endosulfan lactone and endosulfan
28 sulfate) were detected in urine from four of the five PCOs who applied pesticides the
29 previous week. Concentrations were lower than in workers applying pesticides the
30 previous day; α -endosulfan concentrations ranged from 84 to 123 pg/ml, and β -
31 endosulfan concentrations ranged from below the detection limit of 18 pg/ml to 169 pg/ml
32 (Martinez Vidal *et al.*, 1998). Neither endosulfan ether nor endosulfan sulfate was
33 detected in serum samples from the workers. Endosulfan lactone was detected in one
34 worker, at a concentration of 0.18 ng/ml. Little difference was seen in serum endosulfan
35 levels between workers applying the previous day and those applying the previous week;
36 α -endosulfan concentrations ranged from 3.88 to 14.54 ng/ml, and β -endosulfan
37 concentrations ranged from 1.68 to 6.86 ng/ml (Arrebola *et al.*, 2001). No information
38 was provided about endosulfan formulations or amounts applied, thus, relationships
39 cannot be determined between these results and exposures. Additionally, the intermediate
40 metabolic products, endosulfan diol and α -hydroxy ether, were not included in the assay.
41 This study did not provide sufficient data for estimating endosulfan exposures of the
42 PCOs.

1 In another study, Arrebola *et al.* (1999) collected urine samples from a single worker for
2 three days following an endosulfan application in a greenhouse. Both α -endosulfan and β
3 -endosulfan were detected in all samples, with concentrations ranging from 1710 – 4289
4 pg/ml and 491 – 1210 pg/ml, respectively. The excretion rate constant for α -endosulfan
5 was estimated at 0.738/day, and the excretion rate constant for β -endosulfan was
6 estimated at 0.600/day. Half-lives were calculated to be 0.940 days and 1.155 days,
7 respectively. The metabolites endosulfan sulfate, endosulfan ether and endosulfan
8 lactone, were not detected in any samples (detection limits ranged 6 – 18 pg/ml).
9 Interestingly, both α -endosulfan (at 1148 pg/ml) and β -endosulfan (at 1268 pg/ml) were
10 detected in a urine sample from a man who had not applied endosulfan (Arrebola *et al.*,
11 1999). This study did not provide sufficient data for estimating endosulfan exposure.

12 ENVIRONMENTAL CONCENTRATIONS

13 *Dislodgeable Foliar Residues*

14 Dislodgeable foliar residue (DFR) is defined as the pesticide residue that can be removed
15 from both sides of treated leaf surfaces using an aqueous surfactant. DFR is assumed to
16 be the portion of an applied pesticide available for transfer to humans from leaf and other
17 vegetative surfaces. Measurements of DFR can be used, along with an appropriate
18 transfer coefficient (TC; described in the Exposure Assessment section), to estimate the
19 amount of pesticide adhering to clothing and skin surfaces following entry into a
20 previously treated field. The DFR is reported as residue per leaf area ($\mu\text{g}/\text{cm}^2$).
21

22 Studies used for exposure estimates were evaluated for acceptability based on criteria
23 described in Iwata *et al.* (1977) and U.S. EPA (1996). For example, each was performed
24 under climate conditions typical of California growing season; there were no rain events
25 during the study; samples were collected on more than one day extending at least through
26 the REI; replicate samples were collected; residues were dislodged from leaf surfaces with
27 a detergent solution (rather than an organic solvent); and the application rate was at or
28 near the maximum stated on the product label for the crop (although application rates
29 might not affect the dissipation rate, the relationship has not been studied for endosulfan).

30 DFR Dissipation Data

31 Willis and McDowell (1987) summarized data from three studies of dissipation of
32 endosulfan residues in grape, pear and cotton foliage (MacNeil and Hikichi, 1976; Estes
33 *et al.*, 1979; Wilson *et al.*, 1983). However, these studies did not meet acceptability
34 criteria described in Iwata *et al.* (1977) and U.S. EPA (1996), primarily because residues
35 were dislodged with organic solvents rather than detergent solutions. None of these
36 studies was used to estimate exposure.
37

38 Whitmyre *et al.* (2004) evaluated the dissipation of the EC and WP endosulfan
39 formulations on melons, peaches and grapes in Fresno, California. A detailed report of
40 this study was prepared by Singer (1997). The study was conducted in July through
41 September 1995. Crops were irrigated by furrow. Applications occurred twice at 1-week
42 intervals on melons and grapes at application rates of 1.0 and 1.5 lbs AI/acre (1.1 and 1.7

kg AI/ha), respectively, and once on peaches at 3.0 lbs AI/acre (3.4 kg AI/ha). Samples were collected at 0, 1, 3, 5 and 7 days after the first application on melons and grapes and 0, 1, 3, 5, 7, 14, 17, 21, 24, and 28 days after the second application on melons and grapes and after the first application on peaches. Residues were removed from forty 5-cm² leaf discs with an aqueous surfactant solution. Gas chromatography was used for quantification of α - and β -endosulfan and endosulfan sulfate; combined residues were reported. The limit of quantification was 0.01 $\mu\text{g}/\text{cm}^2$. This study met all criteria for acceptability.

Initial regression analysis of the data by Whitmyre *et al.* (2004) indicated that the decay did not follow a simple log DFR vs. time relationship. Use of a two-phase linear model for characterization of the residue decay proved to fit the data better, at least during the first several days (Whitmyre *et al.*, 2004). However, DPR policy is to try a log-quadratic model to improve fit over the log-linear regression (Andrews, 2000). Table 8 summarizes results of log-linear and log-quadratic regressions. It is DPR policy (Andrews, 2000) to use log-linear regression unless log-quadratic gives a substantial improvement in fit (increase in R^2 of ≥ 0.05). Thus, for peach foliage following application of the 50WP formulation, the log-linear model is used; although the R^2 for the log-quadratic model is greater (0.96 vs. 0.95), the difference is just 0.01.

Table 8. Dissipation of Endosulfan on Melons, Peaches, and Grapes^a

Crop	Formulation	<u>Log-Linear Model^b</u>		<u>Log-Quadratic Model^b</u>		Regression Equation with Best Fit ^c
		Adjusted R ²	MSE	Adjusted R ²	MSE	
Melons	3EC	0.77	0.253	0.89	0.124	$y = 0.0053x^2 - 0.25x - 0.95$
Melons	50WP	0.85	0.279	0.97	0.054	$y = 0.0067x^2 - 0.32x + 0.35$
Peaches	3EC	0.70	0.189	0.67	0.205	$y = -0.072x - 2.3$
Peaches	50WP	0.95	0.035	0.96	0.025	$y = -0.087x - 0.74$
Grapes	3EC	0.56	0.551	0.51	0.615	$y = -0.094x - 2.0$
Grapes	50WP	0.65	0.179	0.71	0.149	$y = 0.0031x^2 - 0.15x + 0.057$

^a Data from Whitmyre *et al.* (2004). Applications: melons, 2 at 1.0 lb AI/acre; grapes, 2 at 1.5 lb AI/acre; peaches, one at 3.0 lbs AI/acre (1.1, 1.7, and 3.4 kg AI/ha, respectively).

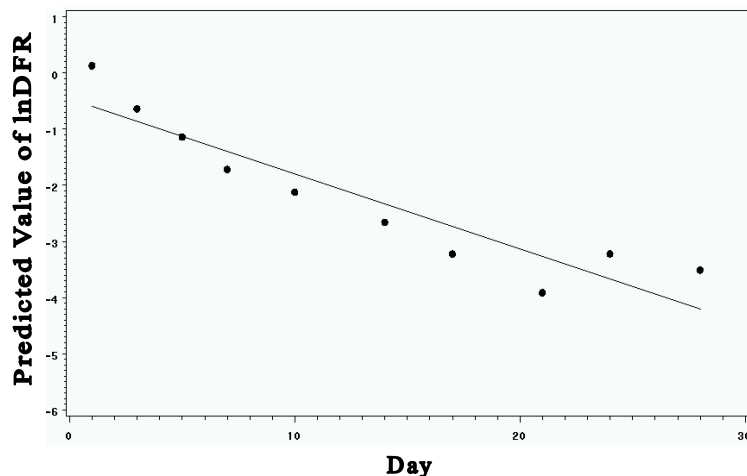
^b Regressions done in SAS 9.1 using Proc REG (SAS, 2003). MSE: mean square error. For each pair of regressions, the one giving the best fit is shown in bold; linear regression is preferred unless quadratic regression gives sufficient improvement in fit (increase in R^2 of ≥ 0.05).

^c Variables in equations: $y = \ln \text{DFR}$, $x = \text{Day}$. See Appendix 2 for values used in exposure estimates.

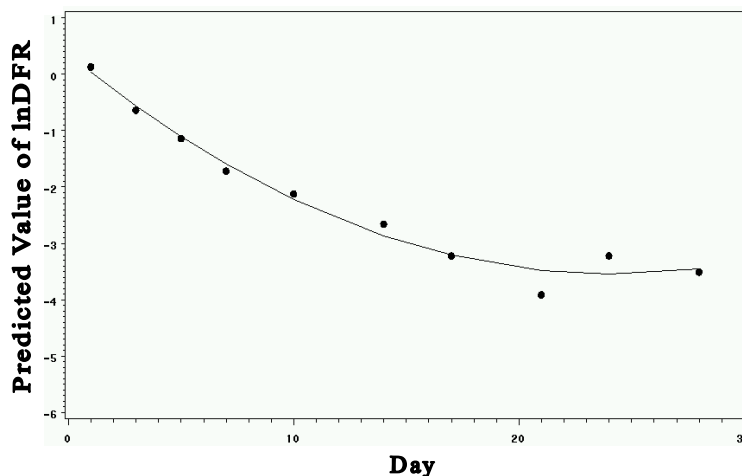
Mean DFR results used in regressions and predicted DFR values for selected reentry days are given in Appendix 2. Figure 2 shows the dissipation curves fitted from DFR on melon foliage following a WP application. Visual inspection of these curves confirms the results in Table 8, that the log-quadratic regression fits these data better ($R^2 = 0.97$ vs. $R^2 = 0.85$).

Figure 2. Endosulfan Dissipation on Melons Following a Wettable Powder Application ^a

A) Log-Linear Regression



B) Log-Quadratic Regression



^a Data from Whitmyre *et al.* (2004). Combined residues of α -endosulfan, β -endosulfan and endosulfan sulfate.

Maddy *et al.* (1985a) investigated the dissipation of endosulfan on tomato, bok choy (Chinese cabbage), celery and napa cabbage in Fresno and San Luis Obispo counties. Endosulfan in an EC formulation was applied at a rate of 1.0 lb AI/acre (1.1 ka AI/ha) to all crops; applications to tomatoes were made aerially and applications to the other crops were made with a groundboom. Although it did not rain, all fields were irrigated during the study. Napa cabbage and two of the bok choy fields were irrigated with a sprinkler system, which wet the foliage and affected the DFR dissipation; data from these fields are not presented and were not used. Tomatoes, celery and one bok choy field were irrigated by furrow, which was not anticipated to affect DFR. This study met all criteria for

acceptability. Table 9 summarizes DFR dissipation (combined residues of α -endosulfan, β -endosulfan and endosulfan sulfate).

Another DFR study (data not shown) in which endosulfan was applied in an EC formulation to bok choy (Maddy *et al.*, 1985b) reported similar DFR results as Maddy *et al.* (1985a). Mean DFR results used in regressions for Table 9 and predicted DFR values for selected post-application days are given in Appendix 2.

Table 9. Dissipation of Endosulfan on Tomato, Celery, and Bok Choy ^a

Crop	Formulation	<u>Log-Linear Model ^b</u>		<u>Log-Quadratic Model ^b</u>		Regression Equation with Best Fit ^c
		Adjusted R ²	MSE	Adjusted R ²	MSE	
Tomato	3EC	0.77	0.253	0.89	0.124	$y = -0.25x - 0.95$
Celery	2EC	0.70	0.189	0.67	0.205	$y = -0.072x - 2.3$
Bok Choy	2EC	0.56	0.551	0.51	0.615	$y = -0.094x - 2.0$

^a Data from Maddy *et al.* (1985a). All applications were 1.0 lb AI/acre (1.1 kg AI/ha), emulsifiable concentrate formulation. Data from fields irrigated with sprinklers were omitted; only fields irrigated by furrow were included. Combined residues of α -endosulfan, β -endosulfan and endosulfan sulfate.

^b Regressions done in SAS 9.1 using Proc REG (SAS, 2003). MSE: mean square error. For each pair of regressions, the one giving the best fit is shown in bold; linear regression is preferred unless quadratic regression gives sufficient improvement in fit. Criteria for decision in Andrews (2000).

^c Variables in equations: $y = \ln \text{DFR}$, $x = \text{Day}$. See Appendix 2 for back-transformed values from equations.

Examination of all DFR data shown in Appendix 2 allows a comparison of DFR results from Maddy *et al.* (1985a) with those from Whitmyre *et al.* (2004). The comparison shows that DFR results from fields treated with EC formulations (Maddy *et al.*, 1985a; Whitmyre *et al.*, 2004) are consistently lower than those from fields treated with WP formulations (Whitmyre *et al.*, 2004). Similarly, Rech and Edmiston (1988) obtained higher DFR results on greenhouse flower foliage treated with a WP endosulfan product than with an EC endosulfan product (data not shown). Previous comparisons between liquid and WP formulations of other pesticides have suggested that residues from WP applications might be more readily dislodgeable (Wolfe *et al.*, 1975; Spear and Pependorf, 1976). Spear and Pependorf (1976) also reported higher exposures in workers reentering crops treated by a WP than a liquid formulation. These comparisons suggest that DFR results from crops treated with WP products provide the best values to use to ensure that reentry worker exposures are not underestimated.

Table 10 summarizes DFR values that were used in reentry exposure estimates (exposure estimates are given in the Exposure Assessment section). The representative crops listed in this table are from Table 4 and application rates and days post-application are from Table 5; if these rates differed from rates used in selected studies, then DFR values used in exposure estimates were adjusted for the rate difference (i.e., multiplied by the ratio of maximum rate allowed on crop to the application rate used in the study). Surrogate crops were chosen to match representative crops as closely as possible; for example, values

from peach data were used as surrogates for all tree crops. DFR values shown in Table 10 are from Appendix 2.

Table 10. Endosulfan Dislodgeable Foliar Residue (DFR) Values Used in Exposure Estimates

Crop ^a	Rate ^b	DFR for Reentry at REI ^c	DFR for Harvesting (Short-Term) ^d	DFR for Seasonal and Annual Exposure ^e		DFR from Crop ^f
				Seasonal	Annual	
Almond	2.5	0.34	Covered by thinning	NA	NA	Peach
Broccoli	1.0	0.39	0.22 (PHI: 4)	0.055 (10)	0.029 (14)	Melon
Citrus	2.5	0.34	Not applicable	NA	NA	Peach
Corn, Sweet	1.5	0.58	0.58 (PHI: 1/REI: 2)	NA	0.082 (10)	Melon
Cotton	1.5	0.58	Covered by scouting	0.082 (10)	NA	Melon
Cucumber	1.0	0.39	0.39 (PHI: 2)	NA	0.055 (10)	Melon
Grape	1.5	0.62	Covered by cane turning	0.26 (10)	NA	Grape
Lettuce	1.0	0.39 ^g	Covered by scouting	0.055 (10)	NA	Melon
Ornamental Plants	1.0	0.42	0.42 (PHI: 0/REI: 2)	NA	NA	Grape
Peach	2.5	0.34	Covered by thinning	0.17 (10)	NA	Peach
Potato	1.0	0.39	Covered by scouting	0.055 (10)	NA	Melon
Strawberry	2.0	0.83	0.83 (PHI: 1/REI: 2)	NA	NA	Grape
Tomato	1.0	0.39	0.39 (PHI: 2)	NA	0.055 (10)	Melon
^a Representative crops from Table 4. ^b Maximum application rate allowed on crop in pounds of active ingredient per acre (lbs AI/acre), from Table 5. Multiply value by 1.12 to get application rate in kg AI/ha. If DFR came from a study with a different application rate, then DFR values used in exposure estimates were adjusted for the rate difference (i.e., DFR was multiplied by the ratio of maximum rate allowed on crop to rate used in study). ^c DFR values (µg/cm ²) used for short-term exposure estimates for workers entering at expiration of Restricted Entry Interval (REI); under California regulation, REI is 2 days for all crops. ^d DFR (µg/cm ²) estimated for expiration of preharvest interval (PHI). If PHI is less than 2 days, REI of 2 days is used. DFR values used for short-term exposure estimates for harvesters. ^e DFR (µg/cm ²) estimated for non-harvest activities/harvesting. Reentry at post-application day in parentheses. NA = not applicable. ^f Crops and DFR equations shown in Table 8. Surrogate crops were chosen to match representative crops as closely as possible. Unless otherwise noted, values used are from wettable powder data in Appendix 2. ^g A DFR sample mean of 2.0 µg/cm ² from Hernandez <i>et al.</i> (2002) was substituted for this value (see Table 11).						

DFR Studies with Spot Sampling of Crop Foliage

Two studies are available in which spot samples of crop foliage were collected and DFR analyzed; both were done in California by DPR. As part of a large study of pesticide residues encountered by reentering fieldworkers, Hernandez *et al.* (1998) collected and analyzed 939 foliar samples in sixteen counties in California's Central Valley and coastal regions. No information was available about pesticide applications; samples were tested for multiple pesticides. Endosulfan was detected in 33 samples, at levels ranging from 0.002 to 0.172 µg/cm². Reported detection limits for pesticides in leaf disc extract samples ranged from 2 – 12 µg/sample. Each sample contained residues dislodged from either 405 or 423 cm² of leaf surface, depending on the leaf punch used (Hernandez *et al.*, 1998); thus, the reported detection limits for endosulfan ranged 0.005 – 0.030 µg/cm².

In another study, DFR samples were collected at the expiration of the REI following known pesticide applications (Hernandez *et al.*, 2002). Endosulfan was detected in 128 of a total of 139 samples. Table 11 summarizes results of the study for endosulfan. Although application dates were reported by Hernandez *et al.* (2002), application rates and formulations were not. It is possible that some variability in DFR results summarized in Table 11 are due to differences in application rates or formulations.

Table 11. Dislodgeable Foliar Residues of Endosulfan on Samples Collected from 1998 through 2001 ^a

Crop	Sampling Date ^b	Number of Detects/Total Samples	Minimum detected DFR ^c (µg/cm ²)	Maximum DFR (µg/cm ²)	Mean DFR ^c (µg/cm ²)	SD DFR ^c (µg/cm ²)
Broccoli	10/30/1998	16/16	0.079	0.2575	0.1374	0.0512
Broccoli	10/4/2000	6/6	0.0084	0.0201	0.0142	0.0005
Cauliflower	5/10/2001	0/4	ND	ND	ND	ND
Lettuce, Butter	3/27/1999	8/8	0.0405	0.5350	0.2741	0.1714
Lettuce, Head	3/28/1999	1/8	0.115	0.115	--	--
Lettuce, Head	4/1/1999	12/12	0.0720	0.1543	0.1189	0.0285
Lettuce, Head	3/19/2000	11/11	0.2155	1.5575	0.9244	0.4389
Lettuce, Head	3/21/2000	9/9 ^d	1.1025	2.435	2.0283 ^e	0.0142
Lettuce, Head	10/3/2000	10/10	0.0630	0.7725	0.3737	0.3466
Lettuce, Head	3/25/2001	10/10	0.5125	1.640	1.186	0.3375
Lettuce, Leaf	3/31/1999	18/18	0.0432	0.1248	0.0786	0.0214
Lettuce, Leaf	10/2/2000	10/10	0.0403	0.2465	0.1397	0.0590
Radicchio	3/30/1999	8/8	0.0765	0.2940	0.1566	0.0851
Tomato	8/21/2000	9/9	0.1960	0.7175	0.4353	0.2772

^a Data from Table 1 and Appendix 1 in Hernandez *et al.* (2002). ND: Not detected.

^b Samples collected within 24 hrs of expiration of the 48-hr restricted entry interval for endosulfan.

^c Non-detects excluded from range and statistics. Reported detection limits ranged from 2 – 12 µg/sample.

^d Although ten samples were collected, only nine were analyzed according to the laboratory sample tracking form; Sample Fd00-0021 was marked as “lost.”

^e This mean DFR result (the highest single-day mean) was used in estimating reentry exposure at the expiration of the restricted entry interval for lettuce and crops grouped with lettuce (see Table 10).

Most of the mean results in Table 11 are lower than DFR values listed in Table 10. However, mean DFR results from head lettuce samples ranged from 0.0786 to 2.0283 µg/cm²; three of the six head lettuce samples had mean DFRs above the estimated DFR of 0.39 µg/cm² listed in Table 10. Because of this, the highest daily mean value of 2.0 µg/cm², from 3/21/2000, was used in short-term exposure estimates for reentry workers in lettuce. This single-day mean DFR was used, rather than an overall mean incorporating multiple days, because the application rates for most of the fields sampled in this study are unknown. It's possible that the samples collected on days other than 3/21/2000 followed lower application rates. However, a query of PUR data from applications to head lettuce in Fresno County, for the interval spanning 1 – 3 days before the sample collection date, show no applications exceeding the allowed rate of 1.0 lb AI/acre (sampling on 3/21/2000 occurred in Fresno County, based on information in the study project file). This suggests

1 that the mean DFR value of $2.0 \mu\text{g}/\text{cm}^2$ is not the result of an application rate above the
2 maximum rate allowed; based on available data, this result is considered the best DFR
3 value to use in estimating reentry exposure. To rely instead on surrogate data from the
4 dissipation study conducted in melons would underestimate exposure.

5
6 In contrast to lettuce, the mean DFR of $0.4335 \mu\text{g}/\text{cm}^2$, from tomato foliage sampled on
7 8/21/2000, is very close to the estimated DFR of $0.39 \mu\text{g}/\text{cm}^2$ given in Table 10. This
8 suggests that foliar residues on melons are a better surrogate for residues on tomato
9 foliage than for residues on lettuce.

10
11 A study was submitted to U.S. EPA in which DFR dissipation was determined on apples,
12 apricots, processing tomatoes, and cherry tomatoes (U.S. EPA, 2002b). The study was
13 unacceptable because of poor field recoveries, variable laboratory recoveries, and missing
14 storage and meteorological information. This study was not available to DPR.

15 *Air*

16 As summarized by Burgoyne and Hites (1993), endosulfan has been detected in air
17 samples collected throughout the world, including urban and unpopulated areas, where
18 endosulfan applications are unlikely, as well as agricultural areas where endosulfan is
19 used. In long-term air monitoring conducted in Indiana, endosulfan was detected only in
20 the vapor phase, never on particulate samplers, and generally the only isomer detected
21 was α -endosulfan, with β -endosulfan detected in only two samples (Burgoyne and Hites,
22 1993). Concentrations of α -endosulfan increased with atmospheric temperature.
23 Summarizing several studies comparing the isomers, Schmidt *et al.* (2001) reported that
24 α -endosulfan is the more prevalent isomer in air samples, a trend that is consistent with
25 data reported below. Rice *et al.* (2002) found that α -endosulfan was more volatile than β -
26 endosulfan following application to a fine-silty loam.

27
28 California has laws intended to limit ambient air concentrations of pesticides, including
29 the Toxic Air Contaminants Act (California Health and Safety Code, Sections 39650-
30 39761), which codified the state program to evaluate and control toxic air contaminants
31 (TAC). A pesticide is placed on the TAC list if its concentrations in ambient air have
32 been determined to be within an order of magnitude of the concentration determined to
33 cause human health effects (3 CCR 6890). Endosulfan is a candidate for inclusion on the
34 TAC list (Sanders, 1997). In California, endosulfan concentrations have been monitored
35 in the ambient air during peak application season and in the air surrounding application
36 sites. These studies are discussed below.

37 Ambient Air

38 DPR monitored ambient air concentrations of several pesticides, including endosulfan, in
39 Monterey County in June 1985 (Sava, 1985). Monitoring was done at three sites in
40 residential areas located near agricultural land. Site 1 was 1200 ft (370 m) from artichoke
41 fields; Site 2 was 190 ft (58 m) from a fallow field; and Site 3 was located 50 ft (15 m)
42 from a lettuce field. Sample devices consisted of XAD-2 resin in two tubes, connected
43 with a tee fitting to air pumps calibrated to 32 L/min. During sampling, air was pumped
44 through the samplers for 6 hrs; twelve samples were collected at each site. Of the 36

1 samples, 30 were below the minimum detection limit of $0.009 \mu\text{g}/\text{m}^3$ for α -endosulfan;
2 concentrations of α -endosulfan in the six samples (four at Site 1, two at Site 2) ranged
3 from 0.034 to $0.051 \mu\text{g}/\text{m}^3$ (Sava, 1985). Neither β -endosulfan nor endosulfan sulfate was
4 detected; minimum detection limits were $0.017 \mu\text{g}/\text{m}^3$ and $0.052 \mu\text{g}/\text{m}^3$, respectively.

5
6 In 1996, ambient air monitoring of endosulfan concentrations was conducted in Fresno
7 County by the Air Resources Board (ARB) of the California Environmental Protection
8 Agency (ARB, 1998). Air samples were collected during a four-week interval, from July
9 29 through August 29, at four sites near cotton and grape growing areas where endosulfan
10 applications might be anticipated (although whether applications actually occurred near
11 all sampling locations during the sampling interval was not reported), and at an urban
12 (background) site. The ambient sites were in populated areas at the following locations:
13 Cantua Creek School in Cantua Creek (Site CC); Westside Elementary School in Five
14 Points (Site WE); San Joaquin Elementary School in San Joaquin (Site SJ); and
15 Tranquility High School in Tranquility (Site TQ). The background site was an ARB
16 Ambient Air Monitoring Station in Fresno (Site ARB). Except for Site ARB, which was
17 above a two-story building, samplers were positioned about 1.5 m above roof tops of
18 single-story buildings. Sample devices consisted of XAD-2 resin connected to air pumps
19 that were calibrated at 2.0 L/min. Duplicate collocated samples were collected on some
20 dates. Table 12 summarizes monitoring results; data from Table 12 were used in
21 estimating ambient air exposures. Italicized values in Table 12 are results that were below
22 the limit of quantification (LOQ), which varied according to the volume of air sampled.
23 The LOQ was calculated by multiplying the analytical limit of detection (LOD) by the
24 sample extract volume and by 3.3 (LOQ was set at 3.3 times the LOD); this was then
25 divided by the volume of air sampled. The analytical LOD was $0.0033 \mu\text{g}/\text{sample}$ for α -
26 endosulfan and $0.011 \mu\text{g}/\text{sample}$ for β -endosulfan. The sample extract volume was 3.0 ml
27 for all samples, and the volume of air sampled ranged from $2.20 - 4.15 \text{ m}^3$.

28
29 Figure 3 shows the monthly use of endosulfan reported in Fresno County in 1996. Nearly
30 80% of endosulfan use in 1996 occurred during the three-month period of June – August.
31 As monitoring began in late July and continued throughout August, all sampling occurred
32 in that high-use period. However, use in June and July was higher than in August,
33 suggesting that the highest ambient air concentrations might not have occurred during the
34 monitoring.

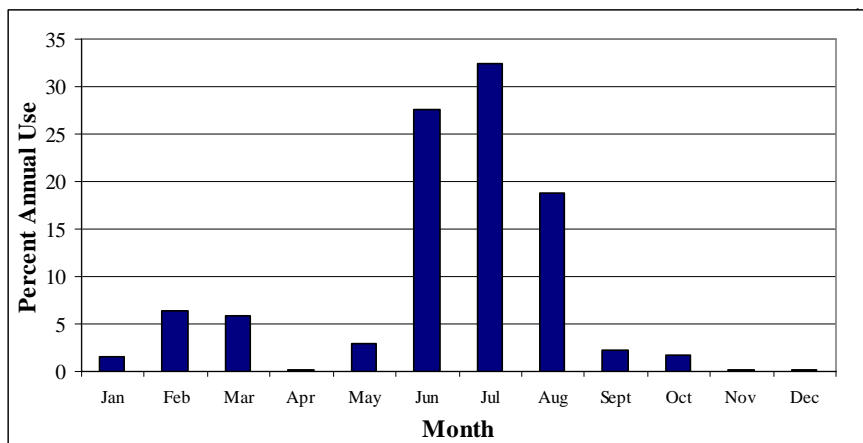
35
36 Of the 75 samples collected at the four stations (excluding the background site), nine were
37 below the LOQ for α -endosulfan, which ranged from 0.0037 to $0.043 \mu\text{g}/\text{m}^3$;
38 concentrations of α -endosulfan in the other samples ranged from 0.0041 to $0.14 \mu\text{g}/\text{m}^3$.
39 For β -endosulfan, only two of the 75 samples were above the LOQ ($0.0086 - 0.015$
40 $\mu\text{g}/\text{m}^3$); concentrations in these samples were 0.013 and $0.026 \mu\text{g}/\text{m}^3$. None of the
41 background samples collected at Site ARB had α -endosulfan or β -endosulfan
42 concentrations above the LOQ.

43
44 In addition to α -endosulfan and β -endosulfan, sample extracts were analyzed for
45 endosulfan sulfate. The analytical LOD for endosulfan sulfate was $0.019 \mu\text{g}/\text{sample}$.
46 Endosulfan sulfate was not detected in any sample, and is not included in Table 12.

1 **Table 12. Endosulfan Concentrations in Ambient Air Monitoring in Fresno County ^a**

Date	Site CC ^b		Site SJ		Site TQ		Site WE		Site ARB	
	α ^c	β ^c	α	β	α	β	α	β	α	β
July 29	0.0083	0.0071	0.017	0.0068	0.021	0.0068	0.0085	0.0069	0.0025	0.0081
July 30	0.029	0.0061	0.016	0.0063	0.020	0.0066	0.023	0.0060	0.0020	0.0066
July 31 ^d	0.0345	0.0062	0.012	0.0062	0.0145	0.0062	0.015	0.0062	0.0019	0.0062
August 1	0.010	0.0062	0.016	0.0062	0.0069	0.0062	0.014	0.0062	0.0019	0.0062
August 5	0.027	0.0067	0.0044	0.0065	0.041	0.0066	NS ^e	NS	0.0023	0.0074
August 6	0.024	0.0062	0.035	0.0062	0.070	0.0062	0.015	0.0062	0.0019	0.0062
August 7 ^d	0.023	0.0064	0.125	0.013	0.034	0.0064	0.014	0.0064	0.0020	0.0064
August 8	0.017	0.0062	0.140	0.026	0.035	0.0063	0.017	0.0064	0.0020	0.0064
August 12	0.018	0.0063	0.013	0.0067	0.0081	0.0066	0.008	0.0043	0.0023	0.0076
August 13	0.020	0.0063	0.019	0.0063	0.017	0.0062	0.010	0.0063	0.0019	0.0062
August 14 ^d	0.014	0.0062	0.0094	0.0062	0.0094	0.0062	0.0057	0.0062	0.0019	0.0062
August 15	0.0090	0.0062	0.011	0.0062	0.045	0.0062	0.0042	0.0062	0.0019	0.0062
August 19	0.0091	0.0065	0.0020	0.0066	0.0059	0.0062	0.0044	0.0065	0.0019	0.0062
August 20	0.0090	0.0062	0.0088	0.0063	0.012	0.0063	0.0059	0.0062	0.0020	0.0063
August 21 ^d	0.0066	0.0063	0.0105	0.0063	0.0165	0.0063	0.0048	0.0063	0.0020	0.0068
August 22	NS ^e	NS	NS	NS	NS	NS	NS	NS	NS	NS
August 26	0.0021	0.0069	0.0019	0.0068	0.0021	0.0069	0.0021	0.0069	0.0025	0.0080
August 27	0.0019	0.0060	0.0019	0.0062	0.0056	0.0062	0.0019	0.0062	0.0017	0.0053
August 28 ^d	0.0046	0.0065	0.0042	0.0061	0.0059	0.0060	0.0019	0.0060	0.0023	0.0074
August 29	0.0047	0.0068	0.010	0.0064	0.019	0.0065	0.0051	0.0065	0.0020	0.0065
Mean ^f	0.014	0.0064	0.024	0.0078	0.020	0.0064	0.0089	0.0062	0.0020	0.0066
SD ^f	0.0097	0.0003	0.039	0.0047	0.017	0.0002	0.0061	0.0005	0.0002	0.0007
^a Monitoring conducted in 1996 (ARB, 1998). Concentrations are reported in $\mu\text{g}/\text{m}^3$. For results below the limit of quantification (LOQ), $\frac{1}{2}$ LOQ was reported; these values are italicized. The LOQ for each sample was dependent on the volume of air sampled. The analytical limit of detection was 0.0033 $\mu\text{g}/\text{sample extract}$ for α -endosulfan and 0.011 $\mu\text{g}/\text{sample extract}$ for β -endosulfan. Sample extract volume was 3.0 ml. ^b Site CC: Cantua Creek School, Cantua Creek. Site SJ: San Joaquin Elementary School, San Joaquin. Site TQ: Tranquility High School, Tranquility. Site WE: Westside Elementary School, Five Points. Site ARB: background site at the ARB Ambient Air Monitoring Station, Fresno. ^c α : alpha isomer (endosulfan 1). β : beta isomer (endosulfan 2). ^d Collocated duplicate samples. Mean reported. ^e NS: No sample on this date, due to instrument malfunction. ^f Arithmetic mean and standard deviation (SD).										

2
3 Ambient air monitoring of several pesticides, including α -endosulfan, β -endosulfan,
4 endosulfan sulfate, was also conducted in May to September 1996 at three sites in Tulare
5 County (LeNoir *et al.*, 1999). Elevations of the sample stations were provided as the
6 study was intended to monitor up-slope movement of pesticides used in the Central Valley
7 into the Sierra Nevada Mountains. The first site was at the Kaweah Dam (Site KD), at a
8 reported elevation of 200 m above sea level. The other two sites were in the Sierra
9 Mountains, on Ash Mountain (Site AM, elevation 553 m) and Lower Kaweah (Site LK,
10 elevation 1920 m).

Figure 3. Monthly Use of Endosulfan in Fresno County, 1996 ^a

16

^a Percent calculations based on pounds applied by all methods to all crops in Fresno County (DPR, 2006b; queried January 26, 2006).

Duplicate 8-hour (daytime) air samples were collected monthly at each site. Paired samplers were positioned 2 m apart and 1 m above ground. Each air sampler consisted of a stainless steel tubes with 100-mesh screens on either end (which allow passage of particles with diameters up to approximately 149 μm), containing 150 ml of pre-cleaned XAD-4 resin and connected to a flowmeter and a high flow sampling pump with nominal flow rate of 700 L/min. The LOQ (three times the reported LOD) was 0.0000018 $\mu\text{g}/\text{m}^3$, 0.000003 $\mu\text{g}/\text{m}^3$, and 0.0000027 $\mu\text{g}/\text{m}^3$, respectively, for α -endosulfan, β -endosulfan, and endosulfan sulfate. Quality assurance consisted of duplicate samples and spikes through which air was drawn for 8 hr. Average spike recovery was 83% for α -endosulfan, 80% for β -endosulfan, and 75% for endosulfan sulfate. Results are shown in Table 13.

Site KD is adjacent to citrus orchards, while Site AM was about 18 km east of Site KD and Site LK is 10 km northeast of Site AM. Both Site AM and Site LK are located in the Sequoia National Forest. Although these sites are not adjacent to cropland, the summertime winds are predominantly from the northwest, and all three sites are downwind of croplands in Tulare and Fresno counties (LeNoir *et al.*, 1999). However, concentrations measured at these sites were lower than those measured in Fresno County; therefore, ambient air exposures were estimated from concentrations in Table 12.

Application Site Air

ARB monitored endosulfan concentrations in air near an airblast application of endosulfan to a 6-acre (2.4-ha) apple orchard in San Joaquin County in 1997 (ARB, 1998). Endosulfan in a WP formulation was applied at a rate of 1.5 lb AI/acre (1.7 kg AI/ha). The orchard was L-shaped, and three air monitoring stations were located along the “outer” edges of the “L”. These stations, designated the E, W, and S stations, respectively, were approximately 6.4 m from the eastern edge; 10 m from the western edge; and 8.2 m from the southern edge. The N station was located inside the angle of the

L-shape, about 16.5 m west and 86 m north of the inside edges of the orchard, and about 12.8 m south of the northernmost edge of the orchard. The W, S, and N samplers were at the same elevation as the orchard while the E sampler was on a levee about 1 m higher than the orchard. Sample devices consisted of XAD-2 resin connected to air pumps calibrated to 2.0 L/min. Duplicate collocated samples were collected at the S station. The application took place on April 8 between 5:45 and 7:45 AM. Samples were collected from April 8, the day of application, through April 11.

Table 13. Endosulfan Concentrations in Ambient Air Monitoring in Tulare County^a

Date	Site KD ^b			Site AM			Site LK		
	α ^c	β ^c	Sulfate ^c	α ^c	β ^c	Sulfate ^c	α ^c	β ^c	Sulfate ^c
5/30/96	0.00367	0.00018	0.00001	0.00107	0.00007	0.00001	NS	NS	NS
6/25/96	0.00115	0.00034	0.00001	0.00053	0.00013	0.00001	NS	NS	NS
7/10/96	0.0023	0.0004	0.00005	0.0015	0.00019	0.00004	0.00152	0.00023	0.00003
8/16/96	0.00113	0.00027	0.00005	NS ^d	NS	NS	0.00055	0.00009	0.00002
9/21/96	0.00134	0.00064	0.00007	0.00052	0.00012	0.00002	0.0003	0.00014	0.00002
Mean ^e	0.0019	0.00037	0.00004	0.00090	0.00013	0.00002	0.00079	0.00015	0.00002
SD ^e	0.0011	0.00017	0.00003	0.00047	0.00005	0.00001	0.00064	0.00007	0.00001

^a Results of duplicate samples; duplicates did differed by < 40% (LeNoir *et al.*, 1999). Concentrations are reported in $\mu\text{g}/\text{m}^3$, and have not been corrected for recoveries. All results were above the limit of quantification (LOQ). LOQ for α -endosulfan: 0.0000018 $\mu\text{g}/\text{m}^3$. LOQ for β -endosulfan: 0.000003 $\mu\text{g}/\text{m}^3$. LOQ for endosulfan sulfate: 0.0000027 $\mu\text{g}/\text{m}^3$.

^b Site KD: Kaweah Dam, 200 m elevation. Site AM: Ash Mountain in the Sequoia National Park, 553 m elevation. Site LK: Lower Kaweah in the Sequoia National Park, 1920 m elevation. Samplers were positioned 1 m above ground.

^c α : alpha isomer (endosulfan 1). β : beta isomer (endosulfan 2). Sulfate: endosulfan sulfate.

^d NS: No sample collected on this date.

^e Arithmetic mean and standard deviation (SD).

A time-weighted average (TWA) concentration was calculated for the first day, starting with the hour during which the application occurred (26.75 hours of monitoring). Also, 3-day TWA concentrations were calculated by including monitoring from the two post-application days. These TWA values were used in estimating short-term and seasonal bystander exposures, respectively (see the Exposure Assessment section).

Table 14 summarizes air concentrations during the monitoring periods; data in Table 14 were used to estimate bystander exposures. Of the 28 samples (excluding the background sampling done before application), only one was below the LOQ for α -endosulfan (LOQ = 0.0087 $\mu\text{g}/\text{m}^3$); concentrations of α -endosulfan in the other samples ranged from 0.0066 to 1.2 $\mu\text{g}/\text{m}^3$. For β -endosulfan, 16 of 28 samples were above the LOQ (0.0069 - 0.090 $\mu\text{g}/\text{m}^3$); concentrations in these samples ranged from 0.0070 to 0.20 $\mu\text{g}/\text{m}^3$. None of the background samples collected prior to the application had α -endosulfan or β -endosulfan concentrations above the LOQ.

In addition to α -endosulfan and β -endosulfan, sample extracts were analyzed for endosulfan sulfate. Endosulfan sulfate was below the LOQ in all samples, though above the LOD in seven samples. Because endosulfan sulfate results were all below the LOQ, endosulfan sulfate is not included in Table 14.

Table 14. Endosulfan Concentrations ($\mu\text{g}/\text{m}^3$) Near an Apple Orchard Receiving an Application by Airblast ^a

Date and time of monitoring in 1997	West		North		East		South ^b		Wind Speed ^c	Wind Direction
	α ^d	β ^d	α	β	α	β	α	β		
April 8, 0530-0845 ^e	0.29	0.048	0.53	0.075	0.54	0.073	0.43	0.083	0 – 6	W
April 8, 0845-1040	0.043	0.043	0.46	0.045	1.8	0.091	0.48	0.043	3 – 7	W
April 8, 1040-1440	0.021	0.021	0.71	0.041	3.8	0.200	1.2	0.052	0 – 4	W
April 8, 1440-2245	0.010	0.010	0.43	0.031	1.2	0.073	0.12	0.010	1 – 17	W/SW
April 8-9, 2245-0815	0.004	0.009	0.088	0.009	0.36	0.018	0.066	0.009	3 – 13	W/SW
24-hour TWA ^f	0.046	0.018	0.36	0.031	1.25	0.074	0.33	0.027	NA	NA
Total Endosulfan TWA ^g	0.060		0.391		1.26		0.350		NA	NA
April 9-10, 0815-0800	0.004	0.004	0.081	0.007	0.49	0.035	0.41	0.035	0 – 9	W/NW/N
April 10-11, 0800-0800	0.003	0.003	0.056	0.003	0.38	0.038	0.30	0.038	0 – 10	NW/N/NE
3-day TWA ^h	0.023	0.009	0.175	0.014	0.728	0.050	0.344	0.033	NA	NA
Total Endosulfan TWA ⁱ	0.032		0.189		0.778		0.377		NA	NA

^a Stations ranged from 8.2 – 16.5 m from orchard edges during an application of 1.7 kg AI/ha (ARB, 1998). Concentrations are reported in $\mu\text{g}/\text{m}^3$; background concentrations were below the limit of quantification (LOQ) and are not shown. For results below the LOQ, $\frac{1}{2}$ LOQ was reported; these values are italicized. LOQ dependent on volume of air sampled; analytical limit of detection was 0.00112 $\mu\text{g}/\text{ml}$ sample extract for α -endosulfan and 0.0036 $\mu\text{g}/\text{ml}$ sample extract for β -endosulfan. Each sample consisted of 1.0 ml sample extract.

^b Mean of two stations.

^c Wind speed in miles/hr, from Appendix VII in ARB (1998). NA: not applicable.

^d α : alpha isomer (endosulfan 1). β : beta isomer (endosulfan 2).

^e Air monitoring during application. Subsequent measures are post-application.

^f Time-weighted average (TWA) concentration over first 24 hours, beginning with application at 5:30 AM and ending with sample completed 24.5 hours post-application. Samples taken during 26.75 hours were used as an approximation for the 24-hour TWA. For results below the LOQ, $\frac{1}{2}$ LOQ was used in calculations.

^g Total endosulfan concentration calculated by adding α - and β -endosulfan concentrations together for each sample. 24-hour TWA based on samples taken during the 26.75 hours starting with the application.

^h 3-day TWA on samples taken during the 74.5 hours starting with the application, calculated as above.

ⁱ Total endosulfan 3-day TWA calculated by adding α - and β -endosulfan concentrations together for each sample.

Water

In laboratory experiments conducted by Peterson and Batley (1993), α -endosulfan consistently degraded faster than β -endosulfan; both isomers hydrolyzed faster in alkaline waters than in water close to pH 7. Half-lives in pH 8.5 water at 20°C were 3.6 days for

α -endosulfan and 1.7 days for β -endosulfan. As β -endosulfan is less water soluble than α -endosulfan, it is more likely to partition to sediment as well.

Endosulfan has been monitored in both surface and ground water in California, and in tissues of fish and aquatic invertebrates. The monitoring data relevant to human exposure to endosulfan include surface waters where swimming or wading may occur (e.g., rivers or farm ponds), as well as surface and ground water sources of drinking water in California. Endosulfan residues occurring in drinking water could potentially result in exposure through swimming or bathing (dietary exposure is beyond the scope of this EAD).

Surface Water

Historically, endosulfan has been detected numerous times in California surface waters. Guo and Spurlock (2000) summarized historical monitoring data, reported by nine different agencies between 1990 and July 2000, for pesticides in surface water in California. Monitoring for α -endosulfan, β -endosulfan, and endosulfan sulfate was conducted between August 1990 and July 1996 (DPR, 2004); Table 15 summarizes these data. Table 15 shows that endosulfan sulfate has been detected more frequently in surface water samples than α - or β -endosulfan, and generally at higher concentrations.

Table 15. Summary of Historical Surface Water Sampling Data for Endosulfan in California Through July 1996

Chemical	No. of Analyses ^a	No. of Detections ^a	Detection Frequency (%) ^a	Concentration ($\mu\text{g/L}$) ^b		
				50 th Percentile	75 th Percentile	95 th Percentile
α -Endosulfan	764	40	5.2	0.0025	0.005	0.05
β -Endosulfan	764	41	5.4	0.0025	0.036	0.05
Endosulfan Sulfate	661	114	17.2	0.005	0.029	0.05
^a Adapted from Guo and Spurlock (2000), which summarizes water sampling through July 2000. No monitoring for endosulfan has been reported since July 1996 (DPR, 2004), nor does the database differentiate between surface water systems that are sources of drinking water and those that are not (F. Spurlock, personal communication, June 7, 2005). The limit of quantification (LOQ) ranged from 0.00005 – 0.10 $\mu\text{g/L}$. ^b Values are were calculated using the Percentile function in Excel, from data in DPR (2004). Calculated using $\frac{1}{2}$ LOQ for samples <LOQ. Nine samples collected before introduction of permit conditions were omitted.						

Exposure estimates were based on estimated total endosulfan concentrations, estimated as the sum of concentrations of α -endosulfan, β -endosulfan, and endosulfan sulfate. The sum of 95th percentiles reported in Table 15, 0.15 $\mu\text{g/L}$, was used in estimating short-term swimmer exposure. For long-term exposures, the median total endosulfan concentration of 0.01 $\mu\text{g/L}$ was calculated from the 50th percentile concentrations in Table 15.

1 Endosulfan residues were detected in California surface waters in the Central Valley in
2 1991 through 1993, at concentrations up to 0.039 µg/L (Ross *et al.*, 1996; Ross *et al.*,
3 1999; Ross *et al.*, 2000); these detections are included in data summarized in Table 15.
4 Water samples collected from two lakes in the Sierra Nevada Mountains in 1997
5 contained α-endosulfan at concentrations ranging from 0.00030 – 0.0010 µg/L; β-
6 endosulfan at concentrations ranging from 0.00017 – 0.0018 µg/L; and endosulfan sulfate
7 at concentrations ranging from 0.00033 – 0.0029 µg/L (Fellers *et al.*, 2004). Water
8 samples collected from eight sites in Tulare County, some adjacent to cropland and others
9 in the Sequoia National Park, contained α-endosulfan at concentrations ranging from
10 0.00009 – 0.0248 µg/L and β-endosulfan at concentrations ranging from 0.000041 –
11 0.1405 µg/L (LeNoir *et al.*, 1999). Although these results are not included in data
12 reported in Table 15, they are within the range of those data.

13
14 Movement of endosulfan into surface water via rainfall runoff and irrigation drainage was
15 documented in studies completed in the 1980s (Gonzalez *et al.*, 1987; Fleck *et al.*, 1991).
16 Sampling of rainfall runoff from three treated fields in 1988 detected endosulfan in
17 samples from all three fields, at concentrations ranging from 2.2 to 13 µg/L (Fleck *et al.*,
18 1991). Irrigation drainage samples collected in October 1985 contained endosulfan at one
19 of three sites (detection limit: 0.01 µg/L); the mean ± standard deviation concentration at
20 that site was 0.014 ± 0.005 µg/L (Gonzalez *et al.*, 1987).

21
22 In surface water systems, endosulfan residues have also been detected in sediment
23 (Gonzalez *et al.*, 1987; Fleck *et al.*, 1991; Ganapathy *et al.*, 1997; Weston *et al.*, 2004);
24 mussels (Singhasemanon, 1996; Ganapathy *et al.*, 1997); amphibians (Sparling *et al.*,
25 2001); and fish (Singhasemanon, 1995; Brodberg and Pollock, 1999).

26
27 The detection of endosulfan residues in surface water, sediment, and aquatic organisms,
28 and concerns about endosulfan's toxicity, led DPR, in 1991, to began requiring permit
29 conditions to prevent use of endosulfan where it might be allowed to reach surface water
30 (Okumura, 1991). Initially, these permit conditions were specific to nine counties
31 (Colusa, Imperial, Monterey, Orange, San Joaquin, Santa Cruz, Stanislaus, and Ventura),
32 but in 1992 they were expanded to cover the entire state (Okumura, 1992). Permit
33 conditions specified that County Agricultural Commissioners were not to issue permits for
34 endosulfan use "where runoff due to irrigation or rainfall from the treated area flows
35 directly, or by way of drainage ditches or canals, into surface waters such as streams,
36 rivers, lakes, lagoons, marshes, bays, estuaries, or the ocean."

37
38 No systematic monitoring of surface water has been performed to determine effectiveness
39 of the permit conditions; however, several of the surface water samples containing
40 detectable endosulfan occurred after the permit conditions were introduced. No
41 endosulfan residues have been detected in drinking water in California in the past three
42 years for which data are available (USDA, 2003; 2004; 2005). These results suggest that
43 drinking water systems in California, and household water used for showering and
44 bathing, are not likely to be a source of human exposure to endosulfan.

Ground Water

DPR has a well monitoring program that samples numerous wells each year to determine the presence and geographical distribution of agriculturally applied pesticides in groundwater. The program, including criteria for selection of wells and sampling and analytical methods, is described by Troiano *et al.* (2001). Between 1986 and 2003, a total of 2,758 well water samples collected in 48 California counties (out of 58 counties total) were tested for the presence of endosulfan and endosulfan sulfate (Schuette *et al.*, 2003). Endosulfan was detected in ten samples, at concentrations ranging from 0.01 – 34.7 µg/L. All ten detections were classified as “unverified,” because follow-up sampling failed to detect endosulfan or endosulfan sulfate. These results, along with reported non-detection of endosulfan residues in monitoring of drinking water systems (USDA, 2003; 2004; 2005), suggest that drinking water systems in California drawing from ground water are not likely to be a source of human exposure to endosulfan.

EXPOSURE ASSESSMENT

Exposure estimates are provided for representative exposure scenarios described in the Exposure Scenarios section, as well as for ambient air and bystander scenarios. For each scenario, estimates are provided for short-term (defined in this EAD as acute and up to one week), seasonal (intermediate-term intervals, lasting from one week to one year), annual, and lifetime exposures.

For short-term exposures, DPR estimates the highest exposure an individual may realistically experience during or following legal endosulfan uses. In order to estimate this “upper bound” of daily exposure, DPR generally uses the estimated population 95th percentile of daily exposure. A population estimate is used instead of a sample statistic because sample maxima and upper-end percentiles, in samples of the sizes usually available to exposure assessors, are both statistically unstable and known to underestimate the population values. The population estimate, on the other hand, is more stable because it is based on all the observations rather than a single value; moreover, it is adjusted, in effect, for sample size, correcting some of the underestimation bias due to small samples. A high percentile is estimated, rather than the maximum itself, because in theory, the maximum value of a lognormal population is infinitely large. In practice, exposures must be bounded because a finite amount of active ingredient (AI) is applied. The use of a high percentile acknowledges that the assumed lognormal distribution is probably not a perfect description of the population of exposures, especially at the upper extremes. The population 95th is estimated, rather than a higher percentile, because the higher the percentile the less reliably it can be estimated and the more it tends to overestimate the population value (Chaisson *et al.*, 1999).

To estimate seasonal and annual exposures, the average daily exposure is of interest because over these periods of time, a worker is expected to encounter a range of daily exposures (i.e., DPR assumes that with increased exposure duration, repeated daily exposure at the upper-bound level is unlikely). To estimate the average, DPR uses the arithmetic mean of daily exposure (Powell, 2003). The arithmetic mean is used rather than the geometric mean or the median because, although it can be argued that the latter

1 statistics better indicate the location of the center of a skewed distribution, it is not the
2 center that is of interest in exposure assessment, but the expected magnitude of the
3 exposure. While extremely high daily exposures are low-probability events, they do
4 occur, and the arithmetic mean appropriately gives them weight in proportion to their
5 probability. (In contrast, the geometric mean gives decreasing weight as the value of the
6 exposure increases, and the median gives no weight whatsoever to extreme exposures.) In
7 most instances, the mean daily exposure of individuals over time is not known. However,
8 the mean daily exposure of a group of persons observed in a short-term study is believed
9 to be the best available estimate of the mean for an individual over a longer period.

10 ***Handlers***

11 Exposure Monitoring Studies

12 Exposure of handlers to endosulfan was monitored in three studies (Baugher, 1989;
13 Lonsway *et al.*, 1997; Hatzilarou *et al.*, 2004). In the first study, exposure monitoring was
14 conducted of M/L/As and applicators during airblast applications to pears and plums in
15 California (Baugher, 1989). The airblast sprayers were pulled behind a tractor equipped
16 with one of three cabs: a positive pressure, filtered, air-conditioned Nelson cab; a Case
17 cab with windows open; or a cab with plastic dome windows and a canvas skirt. The
18 workers wore long-sleeved cotton/polyester shirts and denim pants. During
19 mixing/loading, the workers also wore aprons, chemical-resistant gloves and goggles, and
20 half of the replicates applying with the Nelson cab used closed systems for
21 mixing/loading. Passive dosimeters, consisting of patches as described by Durham and
22 Wolfe (1962), were attached on the outside and inside of the clothing. Hand exposure
23 was determined by sequential washes with soapy water and then water alone. Face and
24 neck exposures were estimated from extrapolation of the residues on the chest and back
25 dosimeters, respectively. The workers in the study handled 30-60 lbs (14-27 kg) of
26 endosulfan, and application times ranged from 3.5 – 8.5 hrs. Passive dosimetry results
27 averaged an exposure of 40.2 µg/lb AI handled for M/L/A using closed systems for
28 mixing/loading and applying endosulfan in tractors with closed cabs; 55.4 µg/lb AI
29 handled for M/L/A open-pour mixing/loading and applying endosulfan in tractors with
30 closed cabs; and 671 µg/lb AI handled for M/L/A open-pour mixing/loading and applying
31 endosulfan in tractors with open windows. Urinary monitoring for endosulfan diol was
32 conducted for a period of 7 days. This metabolite was found above the limit of detection
33 (0.001 mg/l) in the urine of only one worker, at a concentration of 0.0017 mg/l, and was
34 considered by Baugher (1989) to be a false positive result because of the timing (14 days
35 post-exposure). Therefore, this metabolite could not be used to derive an estimate of
36 exposure. Because only three to six workers were monitored in the study under each set
37 of conditions, there was insufficient replication to develop a reliable estimate of exposure.
38 Results from this study were not used in estimating dermal exposure of handlers to
39 endosulfan. U.S. EPA also found this study (submitted in two different reports) to be
40 deficient and did not use it in their exposure assessment (U.S. EPA, 2002b).

41
42 Exposure of M/Ls and applicators to endosulfan during groundboom applications to
43 tobacco was studied in Kentucky (Lonsway *et al.*, 1997). Two mixing/loading and five
44 application events with endosulfan were monitored in this study. All activities were

1 timed, and exposures were reported as mg AI/hr; total amounts of AI handled during each
2 activity were not reported. Dermal exposure was estimated by assaying pesticide residues
3 extracted from cotton gloves and gauze pads according to the method of Durham and
4 Wolfe (1962). Inhalation exposure was estimated by assaying pesticide residues extracted
5 from cartridges in personal air samplers. The M/Ls open-poured endosulfan into spray
6 tanks. Mean M/L exposure to endosulfan was reported to be 135.3 mg/hr, of which 133.5
7 mg/hr (98.7%) was to the hands. Pesticide mixtures were applied with a ground boom
8 tractor (no information was given about whether the tractor had a closed cab) or an open
9 air highboy on 2.025-hectare (ha) test plots at a rate of 1 to 2 kg per ha. The total dermal
10 exposure of applicators to endosulfan averaged 102.7 mg/hr. Hand exposure accounted
11 for 39% (40.1 mg/hr) of this total, face and neck for 25% (25.4 mg/hr), chest for 18%
12 (18.6 mg/hr), and back of the neck 13% (12.9 mg/hr). Endosulfan was not recovered from
13 the respiratory cartridges (detection limit 0.25 ppm). Because amounts of endosulfan
14 handled by each worker were not reported; mixing/loading was not done with a closed
15 system (a closed system is required in California); insufficient information was given
16 about applicator conditions (e.g., whether tractors had closed cabs); and because few
17 replicates were monitored (two M/Ls and five applicators), results from this study could
18 not be used to estimate worker exposure. U.S. EPA (2002b) apparently did not consider
19 this study in their exposure assessment, nor was it mentioned in the RED (U.S. EPA,
20 2002b).

21
22 Hatzilazarou *et al.* (2004) monitored exposure to several pesticides, including endosulfan,
23 using filter paper discs placed on the forehead and the chest of workers spraying pesticide
24 solutions in a greenhouse. Pesticide solutions were applied to potted plants on benches
25 until run-off, using a handheld sprayer with a 5-liter tank. The application rate for
26 endosulfan was approximately 0.218 lbs AI/acre (0.317 kg AI/ha), although the amount of
27 pesticide handled was not reported. Endosulfan residues were recovered from filter
28 papers on both head and chest of the applicator, at 0.6 $\mu\text{g}/\text{cm}^2$ and 1.2 $\mu\text{g}/\text{cm}^2$,
29 respectively. Pesticide concentrations in greenhouse air were determined at 2, 6, 12, 24,
30 72, and 144 hours post-application. Total endosulfan concentrations were highest during
31 the first 2 hours post-application, at 10 $\mu\text{g}/\text{m}^3$. Between 2 and 12 hours, the average
32 endosulfan concentration was 6 $\mu\text{g}/\text{m}^3$. Because the amount of pesticide handled was not
33 reported, a single replicate was monitored, and only partial dermal exposure monitoring
34 was done (head and chest only), this study could not be used to estimate worker exposure.

35 Exposure Estimates Using Surrogate Data

36 Although no acceptable studies were available in which handler exposure to endosulfan
37 was monitored, one acceptable study was submitted in which dermal and inhalation
38 exposure of airblast applicators to the surrogate compound, carbaryl, was monitored
39 (Smith, 2005). This study provided acceptable data for estimating exposure of airblast
40 applicators driving open-cab tractors. Carbaryl was applied in three orchard crops
41 (peaches, apples, and citrus) in three states (Georgia, Idaho, and Florida). Applicators
42 wore either Sou'wester rain hats (15 replicates) or hooded rain jackets (10 replicates) as
43 chemical-resistant headgear; because the jackets provided an extra layer of clothing over
44 the torso and arms, only data from the replicates wearing rain hats were used to estimate
45 exposure. Dermal exposure was monitored with whole-body dosimeters, face/neck wipes,

hand washes and patches on the inside and outside of headgear. Inhalation exposure was monitored with breathing zone air samplers consisting of OSHA Versatile Sampler tubes, each containing glass fiber filter and XAD-2 sorbent and connected to a sampler pump calibrated to 2 liters per minute. Applicators were monitored for 5 – 8 hours each, which is about the length of a typical workday for them. Actual spray times ranged 3.3 – 5.7 hours; applicators handled 24 – 90 pounds AI (11 – 41 kg), and treated 12 – 30 acres (5 – 12 ha). Quality assurance samples consisted of laboratory control samples of each matrix, laboratory-fortified samples of each matrix, and field fortified samples of each matrix. Field fortifications (FFs) consisted of each sample matrix spiked with formulated product, and with the exception of socks all FF recoveries were in the acceptable range (70 – 120%). Results were corrected for FF recoveries below 90%.

Exposure monitoring results for airblast applicators wearing Sou'wester rain hats are summarized in Table 16. Airblast applicators are required to wear chemical-resistant headgear, as product labels require chemical-resistant headgear for overhead exposures such as occur during airblast application.

Table 16. Exposure of Open-Cab Airblast Applicators ^a

	Exposure Rate (µg AI/lb handled)
<u>Dermal Exposure</u>	
Arithmetic Mean	70.2
Standard Deviation	65.4
95 th Percentile ^b	276
<u>Inhalation Exposure</u>	
Arithmetic Mean	3.41
Standard Deviation	3.65
95 th Percentile ^b	9.54
^a Summary of data from open-cab airblast exposure monitoring study (Smith, 2005). Only the 15 replicates wearing Sou'wester rain hats were included; product labels require chemical-resistant headgear for overhead exposures such as occur during airblast application. Arithmetic mean exposure rates were used to calculate long-term exposures and 95 th percentile exposure rates were used to calculate short-term exposures. All estimates were rounded to three significant figures.	
^b 95 th percentile estimates calculated in Excel, assuming a lognormal distribution. First the natural logarithm (ln) was calculated for each value using the LN function; arithmetic mean and standard deviation was then calculated for the natural logarithms (am(lns) and asd(lns), respectively). The NORMSINV function, with a probability of 0.95, was used to get the inverse of the standard normal cumulative distribution, which was multiplied by asd(lns). This result was added to am(lns), and the sum taken as the power of e with the EXP function.	

With the exception of airblast applicators and handlers dipping nursery stock (discussed later in this section), exposure estimates were derived using the Pesticide Handler Exposure Database, or PHED (PHED, 1995). PHED was developed by the U.S. EPA, Health Canada and the American Crop Protection Association to provide non-chemical-specific pesticide handler exposure estimates for specific handler scenarios. It combines exposure data from multiple field monitoring studies of different AIs. The user selects a subset of the data having the same or a similar application method and formulation type as the target scenario. The use of non-chemical-specific exposure estimates is based on two

assumptions, that exposure is primarily a function of the pesticide application method/equipment and formulation type rather than the physical-chemical properties of the specific AI, and that exposure is proportional to the amount of AI handled (Reinert *et al.*, 1986; Versar, 1992). These assumptions are supported by comparisons of exposure across several studies (Rutz and Krieger, 1992).

PHED has limitations as a surrogate database (Powell, 2002). It combines measurements from diverse studies involving different protocols, analytical methods and residue detection limits. Most dermal exposure studies in PHED use the patch dosimetry method of Durham and Wolfe (1962); residues on patches placed on different parts of the body are multiplied by the surface area of the body part to estimate its exposure. These partial estimates are then summed to provide a total body exposure estimate. Some studies observed exposure only to selected body parts such as the hands, arms and face. As a consequence, dermal exposure estimates for different body parts may be based on a different set of observations. Further, for some handler scenarios, the number of matching observations in the PHED is so small that the possibility they do not represent the target scenario is substantial. Due to the degree of uncertainty introduced by PHED, DPR calculates upper confidence limits on the exposure statistics to increase the confidence in the estimates of exposure.

When using surrogate data to estimate short-term exposure, DPR uses the 90% upper confidence limit (UCL) on the 95th percentile. The UCL is used to account for some of the uncertainty inherent in using surrogate data and to increase our confidence in the estimate. (Confidence limits on percentiles, also called tolerance limits, are described by Hahn and Meeker (1991).) Estimating the confidence limit requires knowing the mean and standard deviation. PHED reports the mean of total dermal exposure, but only the coefficients of variation for separate body regions. Because the sample sizes per body region differ and because the correlations among body regions are unknown, the standard deviation of total dermal exposure cannot be calculated. In order to approximate the confidence limit for the 95th percentile, DPR makes the assumption that total exposure is lognormally distributed across persons and has a coefficient of variation of 100 percent. The approximation (Powell, 2002) uses the fact that in any lognormal distribution with a given coefficient of variation, the confidence limit for the 95th percentile is a constant multiple of the arithmetic mean. The value of the multiplier depends only on sample size. To use the approximation with PHED data, the multiplier corresponding to the sample size is used (for dermal exposure, the median number of observations over body regions is used). If the sample size is between 20 and 119, the multiplier is 4; if it is between 12 and 19, the multiplier is 5 (Powell, 2002). Assumptions used in exposure calculations, results of PHED subsets, and short-term handler exposure estimates for workers handling endosulfan in support of aerial and ground applications are given in Table 17.

When using surrogate data to estimate seasonal or annual exposure, DPR uses the 90% UCL on the arithmetic mean. The 90% UCL is used for the reasons listed in the previous paragraph. As with short-term exposure estimates based on PHED subsets, a multiplier corresponding to the median sample size over body regions is used. If the median sample size is greater than 15, the multiplier is 1 (Powell, 2002).

1 **Table 17. Exposure Rates Calculated from Surrogate Data and Short-Term**
 2 **Exposure Estimates for Workers Handling Endosulfan in Support of Aerial and**
 3 **Ground Applications ^a**

Scenario	# ^b	Short-Term Exposure Rates ^c		Long-Term Exposure Rates ^d		STADD ^e		
		(µg/lb AI handled)		(µg/lb AI handled)		(mg/kg/day)		
		Dermal	Inhalation	Dermal	Inhalation	Dermal	Inhalation	Total
<u>Aerial</u> ^f								
M/L EC	3	37.0	0.512	9.24	0.128	0.219	0.006	0.225
M/L WP ^g	4	392	24.7	98.0	4.94	2.32	0.309	2.63
M/L WP/WSP	5	28.4	1.38	11.3	0.554	0.168	0.017	0.185
Applicator	6	133	0.286	44.3	0.115	0.786	0.004	0.790
Flagger	7	62.8	0.080	16.0	0.020	0.371	0.002	0.373
<u>Airblast</u> ^h								
M/L EC	3	37.0	0.512	9.24	0.128	0.025	0.001	0.026
M/L WP	4	392	24.7	98.0	4.94	0.265	0.035	0.300
M/L WSP	5	28.4	1.38	11.3	0.554	0.019	0.002	0.021
Applicator	--	276	9.54	70.2	3.41	0.187	0.001	0.188
<u>GB</u> ⁱ								
M/L EC	3	37.0	0.512	9.24	0.128	0.040	0.001	0.041
M/L WP ^g	4	392	24.7	98.0	4.94	0.424	0.056	0.480
M/L WSP	5	28.4	1.38	11.3	0.554	0.031	0.003	0.034
Applicator	8	40.6	0.472	6.04	0.118	0.044	0.001	0.045

- ^a All scenarios except airblast applicator were based on data from the Pesticide Handlers Exposure Database (PHED, 1995). Airblast applicator exposure based on data from Smith (2005), shown in Table 16. Exposure rates and exposure estimates were rounded to three significant figures. Abbreviations: EC = emulsifiable concentrate. GB = groundboom. M/L = mixer/loader. WP = wettable powder. WSP = water soluble packaging.
- ^b Appendix number with details from PHED. Handlers were assumed to wear gloves as specified on product labels, except aerial applicators (exempt from wearing gloves under California law); respirator (except M/L using a closed system); and coveralls. M/L assumed to wear chemical-resistant apron. Protection factors given in appendices.
- ^c These exposure rates were used to calculate STADD, as explained in Footnote ^e.
- ^d These exposure rates were used to calculate Seasonal Average Daily Dosage and Annual Average Daily Dosage in Table 18.
- ^e Short-Term Absorbed Daily Dosage (STADD) is an upper-bound estimate calculated from the short-term exposure. Application rate is maximum rate on product labels, which varied for each scenario; acres treated per day varies by scenario. Estimates were rounded to three significant figures. Calculation:

$$\text{STADD} = [(\text{short-term exposure}) \times (\text{absorption}) \times (\text{acres treated/day}) \times (\text{application rate})] / (70 \text{ kg body weight}).$$
Calculation assumptions include: Dermal absorption = 47.3% (Craine, 1988) ; Body weight = 70 kg (Thongsinthusak, *et al.*, 1993); Inhalation rate 16.7 L/min (Andrews and Patterson, 2000); Inhalation absorption = 100%.
- ^f STADD estimates assumed 350 acres (142 ha) treated/day (U.S.EPA, 2001), and a maximum application rate of 2.5 lbs AI/acre (2.8 kg AI/ha), maximum rate on tree nuts.
- ^g Data from open pouring mixing/loading used in exposure estimate. U.S. EPA (2002a) would require all WP to be packaged in WSP, and non-WSP packaging is being phased out.
- ^h STADD estimates assumed 40 acres (16 ha) treated/day (U.S. EPA, 2001), and a maximum application rate of 2.5 lbs AI/acre (2.8 kg AI/ha), maximum rate on tree nuts.
- ⁱ STADD estimates assumed 80 acres (32 ha) treated/day (U.S. EPA, 2001), and a maximum application rate of 2.0 lb AI/acre (2.2 kg AI/ha), maximum rate on strawberry, pineapple, or crucifers for seed only.

1
2 Handlers of endosulfan are required to wear protective clothing and PPE, as described in
3 the Label Precautions and California Requirements section. Clothing and PPE have been
4 shown to reduce exposure to pesticides (Thongsinthusak *et al.*, 1991), and default
5 protection factors are used by DPR to adjust exposure estimates. For M/Ls, exposure
6 estimates were provided for WP in both WSP and non-WSP packaging. U.S. EPA
7 (2002a) would require all WP to be packaged in WSP, and non-WSP packaging is being
8 phased out. However, as of September 2006, non-WSP products were available in
9 California.

10
11 Surrogate data from the PUR also were used to estimate intervals for seasonal and annual
12 exposures. Endosulfan is registered for use on several different crops, and for many crops
13 repeated use is allowed within a growing season, suggesting that handlers may potentially
14 be exposed throughout the year. Repeated exposures are especially likely for professional
15 applicators and their employees, as these handlers can make the same treatment for
16 several growers. However, PUR data show that in many parts of the state and in many
17 crops endosulfan use does not occur throughout the year, and that at other times relatively
18 few applications are made. It is reasonable to assume that an individual handler is less
19 likely to be exposed to endosulfan during these relatively low-use intervals. Thus, rather
20 than assume that handlers are exposed throughout the year, annual use patterns are plotted
21 based on monthly PUR data from one or more counties with the highest use. Annual
22 exposure to endosulfan is assumed to be limited to the months when use is relatively high
23 (defined as 5% or more of annual use each month). Seasonal, annual, and lifetime

exposure estimates for workers handling endosulfan in support of aerial and ground applications are given in Table 18.

U.S. EPA (2002b) assumed that handler exposure durations would only be one day to one month. The basis for this assumption was not explained.

Aerial applications

The maximum application rate for endosulfan applied aurally is on nut crops, 2.5 lb/acre (2.8 kg AI/ha). The number of acres treated per day was assumed to be 350 acres/day (142 ha/day), based on the default recommended by U.S. EPA (2001). Exposure estimates for handlers involved in aerial applications assumed that M/Ls and flaggers wear the clothing specified on product labels: long-sleeved shirt and pants, waterproof or chemical-resistant gloves, and shoes and socks (see Appendices 3-6). Applicators (pilots) are not required to wear gloves during an application (3 CCR 6738), and were assumed to wear all of the required clothing and PPE except gloves (see Appendix 6). Open cockpits were assumed for pilots, as there is no requirement for closed cockpits during applications.

Combined short-term absorbed daily dosage (STADD) estimates for M/Ls range 0.185 – 2.63 mg/kg/day, for M/Ls handling EC and WP formulations (Table 17). STADD are 0.790 mg/kg/day and 0.373 mg/kg/day for aerial applicators and flaggers, respectively.

Table 18. Seasonal, Annual, and Lifetime Estimates for Workers Handling Endosulfan in Support of Aerial and Ground Applications

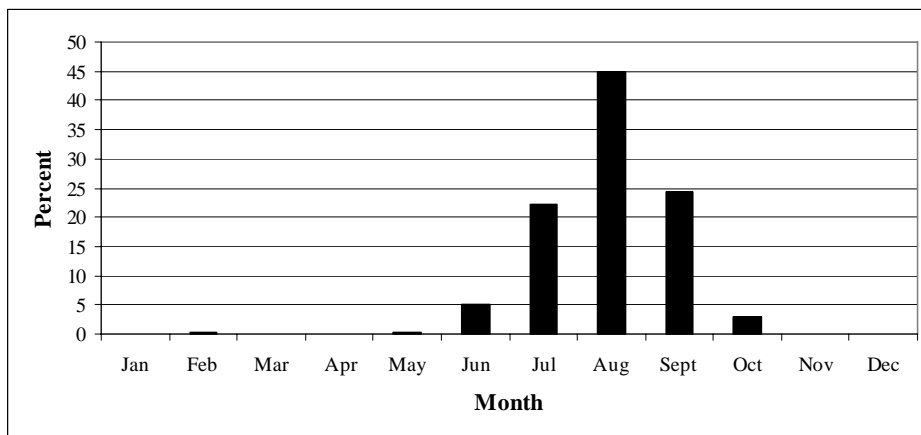
Scenario ^a	SADD ^b (mg/kg/day)			AADD ^c (mg/kg/day)			LADD ^d (mg/kg/day)		
	Dermal	Inhalation	Total	Dermal	Inhalation	Total	Dermal	Inhalation	Total
<u>Aerial</u> ^e									
M/L EC	0.033	0.001	0.034	0.011	0.0003	0.011	0.006	0.0002	0.006
M/L WP ^f	0.348	0.037	0.385	0.116	0.012	0.128	0.062	0.007	0.069
M/L WSP	0.040	0.004	0.044	0.014	0.001	0.015	0.007	0.001	0.008
Applicator	0.157	0.001	0.158	0.053	0.0003	0.053	0.028	0.0002	0.028
Flagger	0.057	0.0002	0.057	0.019	0.00005	0.019	0.010	0.00003	0.010
<u>Airblast</u> ^g									
M/L EC	0.006	0.0002	0.006	0.001	0.00003	0.001	0.0006	0.00004	0.0006
M/L WP ^f	0.066	0.007	0.073	0.011	0.001	0.012	0.006	0.001	0.007
M/L WSP	0.007	0.001	0.008	0.001	0.0001	0.001	0.0007	0.0001	0.0008
Applicator	0.047	0.0005	0.048	0.008	0.00008	0.008	0.004	0.00004	0.004
<u>GB</u> ^h									
M/L EC	0.008	0.0002	0.008	0.003	0.0001	0.003	0.001	0.00004	0.001
M/L WP ^f	0.080	0.008	0.088	0.033	0.004	0.037	0.018	0.002	0.020
M/L WSP	0.009	0.001	0.010	0.004	0.0004	0.004	0.002	0.0002	0.002
Applicator	0.005	0.0002	0.005	0.002	0.0001	0.002	0.001	0.00004	0.001

- ^a Abbreviations: EC = emulsifiable concentrate. GB = groundboom. M/L = mixer/loader. WP = wettable powder. WSP = water soluble packaging containing wettable powder.
- ^b Seasonal Average Daily Dosage is a 90% upper confidence estimate calculated from the long-term exposure rates given in Table 17. Dermal absorption: 47.3% (Craine, 1988). Inhalation absorption assumed to be 100%. Body weight assumed to be 70 kg (Thongsinthusak *et al.*, 1993). Calculation:

$$SADD = [(long\text{-}term\ exposure) \times (absorption) \times (acres\ treated/day) \times (application\ rate)] / (70\ kg\ body\ weight).$$
- ^c Annual Average Daily Dosage = SADD x (annual use months per year)/(12 months in a year).
- ^d Lifetime Average Daily Dosage = AADD x (40 years of work in a lifetime)/(75 years in a lifetime).
- ^e Exposure estimates assumed 350 acres (142 ha) treated/day (U.S. EPA, 2001), and an application rate of 1.5 lbs AI/acre (1.7 kg AI/ha), maximum rate on collards, cotton, grapes, lettuce, sweet corn and tomatoes. Annual exposure estimate based on high-use period of 4 months, based on data from DPR (2006b).
- ^f Data from open pour mixing/loading used in exposure estimate. U.S. EPA (2002a) would require all WP to be packaged in WSP, and non-WSP packaging is being phased out.
- ^g Exposure estimates assumed 40 acres (16 ha) treated/day (U.S. EPA, 2001), and a maximum application rate of 2.5 lbs AI/acre (2.8 kg AI/ha), maximum rate on tree fruits. Annual exposure estimate based on high-use period of 2 months.
- ^h Exposure estimates assumed 80 acres (32 ha) treated/day (U.S. EPA, 2001), and a maximum application rate of 1.5 lb AI/acre (1.7 kg AI/ha), maximum rate on sweet corn, collards, cotton, and lettuce. Annual exposure estimate based on high-use period of 5 months.

To estimate seasonal and annual exposures of workers involved in aerial applications of endosulfan, temporal patterns were investigated by plotting percent of annual use in Fresno County, which has the most aerial applications of endosulfan. Although the maximum application rate for endosulfan is on tree nuts and fruits (2.5 lbs AI/acre, or 2.8 kg AI/ha), PUR data show that endosulfan has rarely been applied to these crops aially (DPR, 2006b; data not shown). Because of this, aerial endosulfan use was determined for crops where the maximum application rate is 1.5 lbs AI/acre (1.7 kg AI/ha), including cotton, grapes, and sweet corn; these data are summarized in Figure 4. The majority of annual use occurred between June and September; these four months include about 96% of annual applications. Annual exposure was estimated to occur during these four months.

Figure 4. Aerial Applications of Endosulfan in Fresno County, 2000 – 2004^a

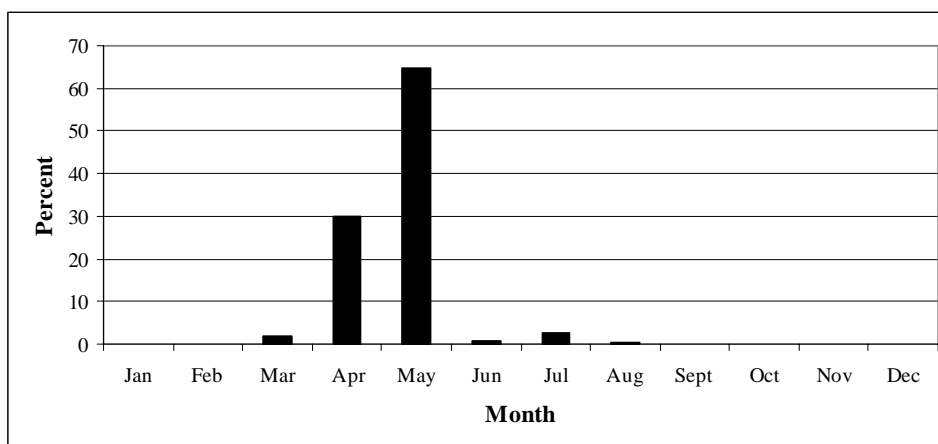


^a Percent calculations based on pounds applied aially to cotton, grapes, and sweet corn in Fresno County (DPR, 2006b; queried January 26, 2006).

1 Airblast applications

2 Table 17 summarizes PHED data used in M/L exposure estimates and STADD for
3 handlers in support of airblast applications of endosulfan. Applicator exposure estimates
4 are based on a recent exposure monitoring study (Smith, 2005). The maximum
5 application rate for endosulfan applied with airblast is on nut crops and tree fruits, 2.5
6 lb/acre (2.8 kg AI/ha). For airblast applications, the amount treated was assumed to be 40
7 acres/day (16 ha/day), the default recommended by U.S. EPA (2001). Exposure estimates
8 for handlers involved in airblast applications assumed that all handlers wear the clothing
9 and PPE specified on product labels (product labels require chemical-resistant headgear
10 for overhead exposures such as occur during airblast application). Open cabs were
11 assumed for applicators, as there is no requirement for closed cabs during applications.
12 STADD for M/Ls range 0.021 – 0.300 mg/kg/day. The applicator STADD is 0.188
13 mg/kg/day.

14
15 Use data from Los Angeles County, which has the most ground applications of endosulfan
16 to tree fruits (including pome and stone fruits), are summarized in Figure 5. The majority
17 of annual use (95%) occurred in two months, April and May (Figure 5). Annual exposure
18 was estimated to occur during these two months.

Figure 5. Airblast applications of Endosulfan in Los Angeles County, 2000 – 2004 ^a

^a Percent calculations based on pounds applied by ground methods to tree fruits in Los Angeles County (DPR, 2006b; queried January 26, 2006).

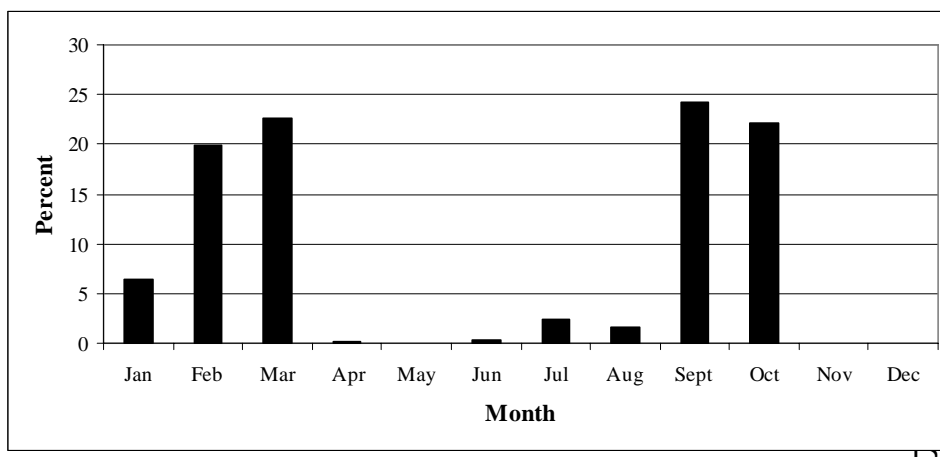
Groundboom Applications

The maximum application rate for endosulfan applied via groundboom is 2.0 lb AI/acre (2.2 kg AI/ha), applied to strawberry, pineapple, or crucifers for seed only. For groundboom applications, the amount treated was assumed to be 80 acres/day (32 ha/day), which is the default used by DPR (U.S. EPA, 2001). Exposure estimates for handlers involved in groundboom applications assumed a closed system for the M/L and that all handlers wear the clothing and PPE specified on the product label: long-sleeved shirt and pants, waterproof gloves, shoes and socks, and respirator. Open cabs were assumed for applicators, as there is no requirement for closed cabs during applications. STADD for M/Ls range 0.041 – 0.480 mg/kg/day. The applicator STADD is 0.045 mg/kg/day (Table 17).

Although the maximum application rate for groundboom is on strawberry or pineapple, examination of PUR data shows that endosulfan has infrequently been applied to these crops (DPR, 2006b; data not shown). Because of this, ground applications of endosulfan to sweet corn, collards, cotton, and lettuce, where the maximum application rate is 1.5 lbs AI/acre (1.7 kg AI/ha), were used instead for seasonal and annual exposure estimates. Use data for endosulfan on these crops in Fresno County, where the highest use on these crops was reported, are summarized in Figure 6.

The majority of annual use occurred in two intervals, January – March, and September – October; these five months accounted for approximately 95% of annual applications (Figure 6). Annual exposure was estimated to occur during these five months. Seasonal, annual and lifetime exposure estimates for handlers of endosulfan in support of groundboom applications are given in Table 18.

1 **Figure 6. Groundboom applications of Endosulfan in Fresno County, 2000 – 2004 ^a**



16 ^a Percent calculations based on pounds applied by ground methods to sweet corn, collards, cotton, and
 17 lettuce in Fresno County (DPR, 2006b; queried January 26, 2006).
 18

19 Backpack Applications

20 Table 19 summarizes PHED data and assumptions used in exposure estimates and
 21 STADD for handlers applying endosulfan with handheld equipment, including backpack
 22 sprayers. In its exposure scenarios for M/L/As using backpack sprayers, U.S. EPA
 23 (2002a) assessed use on three crops, greenhouse tomatoes, tobacco, and cherries. In
 24 California, the highest exposure estimates are associated with applications to macadamia
 25 nuts, where the maximum rate is 1 lb AI/100 gallons. Assuming that workers apply 40
 26 gallons/day (U.S. EPA, 2001), the total amount handled is 0.4 lb AI/day (0.18 kg AI/day).
 27 The STADD is 0.043 mg/kg/day.
 28

29 Although the highest use rate for backpack sprayers is on macadamia nuts, examination of
 30 PUR data shows that endosulfan has infrequently been applied to this crop (DPR, 2006a;
 31 data not shown). Because of this, ground applications of endosulfan to apricots,
 32 nectarines, peaches, and pecans, where the maximum application rate is 0.75 lbs AI/100
 33 gallons, were used instead for seasonal and annual exposure estimates. Assuming that
 34 workers apply 40 gallons/day (U.S. EPA, 2001), the total amount handled is 0.3 lb AI/day
 35 (0.14 kg AI/day).
 36

37 To estimate seasonal and annual exposures of M/L/As applying endosulfan with backpack
 38 sprayers, the average percent of annual use each month was plotted for the most recent
 39 five years for which data are available. Figure 7 summarizes ground applications of
 40 endosulfan to apricots, nectarines, peaches, and pecans in Los Angeles County. For this
 41 estimate, all ground applications were assumed to have been made by backpack sprayers.
 42
 43

1 **Table 19. Data Used and Short-Term Exposure Estimates for Handlers Using**
 2 **Handheld Equipment to Apply Endosulfan**

Scenario ^a	# ^b	Short-term Exposure ^c (µg/lb AI handled)		Long-term Exposure ^c (µg/lb AI handled)		STADD ^d (mg/kg/day)		
		Dermal	Inhalation	Dermal	Inhalation	Dermal	Inhalation	Total
<u>BP</u> ^e M/L/A EC	9	16,000	10.5	5,320	3.50	0.043	0.0001	0.043
<u>HPHW</u> ^f M/L/A EC	10	7,400	75.5	2,960	30.2	0.501	0.010	0.511
<u>LPHW</u> ^e M/L/A EC	11	4,720	13.7	1,570	4.56	0.013	0.0001	0.013
M/L/A WP	12	35,800	520	7,160	104	0.097	0.003	0.100
<u>Dip</u> ^g M/L EC	3	37.0	0.512	--	--	0.00003	0.000001	0.00003
M/L WP	4	392	24.7	--	--	0.0003	0.00004	0.003
Applicator	13/14	--	--	--	--	41.4	0.005	41.4

^a Abbreviations: BP = backpack sprayer. EC = emulsifiable concentrate. HPHW = high pressure handwand. LPHW = low pressure handwand. M/L = mixer/loader. M/L/A = mixer/loader/applicator. WP = wettable powder.

^b Appendix number containing data and assumptions used in calculations. Handlers were assumed to wear gloves, respirator, and coveralls, as specified on product labels. Protection factors given in appendices.

^c Dermal and inhalation exposure calculated from surrogate data using the Pesticide Handlers Exposure Database (PHED) database and software (PHED, 1995). Values from PHED were rounded to three significant figures.

^d Short-Term Absorbed Daily Dosage (STADD) is an upper-bound estimate calculated from the short-term exposure. Application rate is maximum rate on product labels, which varied for each scenario; acres treated per day varies by scenario. Estimates were rounded to three significant figures. Calculation:

STADD = [(short-term exposure) x (absorption) x (acres treated/day) x (application rate)]/(70 kg body weight).

Calculation assumptions include: Dermal absorption = 47.3% (Craine, 1988); Body weight = 70 kg

(Thongsinthusak, *et al.*, 1993); Inhalation rate 16.7 L/min (Andrews and Patterson, 2000); Inhalation absorption = 100%.

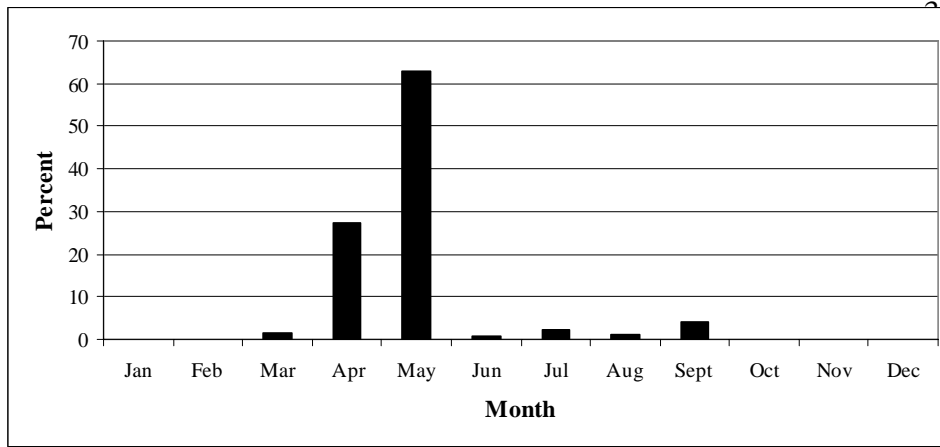
^e STADD estimates assumed handling of 40 gal/day (150 l/day; US EPA, 2001), containing 1.0 lb AI/100 gal (0.12 kg AI/100 l; maximum application for macadamia nuts), for a total of 0.4 lb AI/day (0.2 kg AI/day).

^f STADD estimates assumed handling of 1,000 gal/day (3,800 l/day; US EPA, 2001), containing 1.0 lb AI/100 gal (0.12 kg AI/100 l; maximum application for macadamia nuts), for a total of 10 lb AI/day (4.5 kg AI/day).

^g STADD estimates assumed handling of 40 gal/day, containing 1.25 lb AI/40 gal (0.15 kg AI/40 l), for a total of 1.25 lb AI/day (0.56 kg AI/day). M/L estimates from PHED. Applicator dermal exposure estimates based on RAGS-E equations (U.S. EPA, 2004a). Applicator inhalation exposure estimates based on SWIMODEL (U.S. EPA, 2003), assuming a saturated endosulfan vapor concentration. See Appendix 13 and Appendix 14 for calculations of applicator exposure estimates.

3
 4 Figure 7 shows that about 90 of use occurred in April and May. Annual exposure was
 5 estimated to occur during these two months. Table 20 contains seasonal, annual, and
 6 lifetime exposures estimates.
 7

Figure 7. Ground Applications of Endosulfan to Apricots, Nectarines, Peaches and Pecans in Los Angeles County, 2000 – 2004 ^a



^a Percent calculations based on pounds applied by ground methods (DPR, 2006b; queried January 26, 2006).

Table 20. Seasonal, Annual, and Lifetime Exposure Estimates for Endosulfan Handlers Using Handheld Equipment

Scenario ^a	SADD ^b (mg/kg/day)			AADD ^c (mg/kg/day)			LADD ^d (mg/kg/day)		
	Dermal	Inhalation	Total	Dermal	Inhalation	Total	Dermal	Inhalation	Total
<u>BP</u> ^e									
M/L/A	0.011	0.00002	0.011	0.002	0.000003	0.002	0.001	0.000001	0.001
<u>HPHW</u> ^f									
M/L/A	0.150	0.003	0.153	0.025	0.001	0.026	0.014	0.0003	0.014
<u>LPHW</u> ^e									
M/L/A EC	0.003	0.00002	0.003	0.0005	0.000003	0.0005	0.0003	0.000002	0.0003
M/L/A WP	0.015	0.0004	0.015	0.003	0.0001	0.003	0.001	0.00004	0.001

^a No seasonal, annual, or lifetime exposure is anticipated for workers dipping nursery stock; that scenario is omitted from this table. Abbreviations: BP = backpack sprayer. EC = emulsifiable concentrate. LPHW = low pressure handwand. M/L/A = mixer/loader/applicator. WP = wettable powder.

^b Seasonal Average Daily Dosage is a 90% upper confidence estimate calculated from the long-term exposure estimate given in Table 19. Application rate is maximum rate on product labels, which varied for each scenario; acres treated per day varies by scenario. Dermal absorption assumed to be 47.3% (Craine, 1988). Inhalation absorption assumed to be 100%. Body weight assumed to be 70 kg (Thongsinthusak *et al.*, 1993). Calculation: SADD = [(long-term exposure) x (absorption) x (acres treated/day) x (application rate)]/(70 kg body weight).

^c Annual Average Daily Dosage = SADD x (annual use months per year)/(12 months in a year).

^d Lifetime Average Daily Dosage = AADD x (40 years of work in a lifetime)/(75 years in a lifetime).

^e Estimates assumed handling of 40 gal/day (150 l/day; US EPA, 2001), containing 0.75 lb AI/100 gal (0.09 kg AI/100 l; maximum application for apricots, nectarines, peaches, and pecans), for a total of 0.3 lb AI/day (0.14 kg AI/day). Annual exposure estimate based on high-use period of 2 months, based on data from DPR (2006b).

^f Estimates assumed handling of 1,000 gal/day (3,800 l/day; US EPA, 2001), containing 0.75 lb AI/100 gal (0.09 kg AI/100 l; maximum application for apricots, nectarines, peaches, and pecans), for a total of 7.5 lb AI/day (3.4 kg AI/day). Annual exposure estimate based on high-use period of 2 months.

High Pressure Handwand Applications

High pressure handwands can be used to apply endosulfan to the same crops as backpack sprayers. Exposure was estimated for this scenario using the same assumptions as for the backpack sprayer, except that greater amounts are typically handled with high pressure handwands. Assuming that workers apply 1,000 gallons/day (U.S. EPA, 2001), the total amount handled is 10 lb AI/day (4.5 kg AI/day). The STADD is 0.511 mg/kg/day. Annual exposure was estimated to occur during the two months shown in Figure 7.

Low Pressure Handwand Applications

Low pressure handwands can be used to apply EC endosulfan products to the same crops as backpack sprayers. Exposures were estimated using the same assumptions as for the backpack sprayer. The STADD is 0.013 mg/kg/day for M/L/As handling EC products and 0.100 mg/kg/day for M/L/As handling WP endosulfan products. For M/L/As handling EC products, annual exposures were estimated to occur during the two months shown in Figure 7. Exposure estimates are in Table 20.

Nursery Stock Dip

Nursery stock dipping may be done for treatment of cherry, peach and plum seedlings for peachtree borer. The dipping solution is prepared by mixing 1.25 lb AI in 40 gallons of water. Seedlings are immersed in the dipping solution so that roots and crowns are covered well above the grafting bud scar, then are either planted immediately or dried before storage.

In California, cherry, peach and plum trees are planted in January (UCCE, 2004). Examination of PUR data shows that endosulfan is infrequently applied to nursery stock, with applications reported on just one to six days each year between 2000 and 2004 (DPR, 2006b; data not shown). Therefore, seasonal, annual and lifetime exposures to endosulfan are not anticipated to occur during activities in these crops, and only short-term exposures were estimated.

No information is available on the amount of AI handled, although it is possible that thousands of seedlings are treated daily (Beauvais, 2004). For M/L exposure estimates, it was assumed that workers would handle 1.25 lb AI/day to prepare 40 gallons of dipping solution, and exposures were estimated based on surrogate data from PHED (1995). A closed-system was assumed, as required under California law (3 CCR 6746).

Because details about pesticide root dipping are lacking, exposure estimates for this scenario were based on the assumption that root dips with pesticides are similar to root dipping to protect roots from desiccation, except that pesticidal root dips require workers to wear clothing and PPE specified on pesticide product labels (Appendix 13). Applicators were assumed to immerse seedling roots into a container such as a bucket or vat while holding seedlings above roots, and that hands were immersed in the pesticide solution or slurry. Several models were evaluated to determine the best estimate of applicator exposure (Beauvais, 2004).

1 Applicator dermal exposure was estimated from equations in the Risk Assessment
2 Guidance for Superfund, Part E (RAGS-E; U.S. EPA, 2004a). For dermal absorption of
3 chemicals from water, RAGS-E incorporates the equations recommended by U.S. EPA
4 (1992). These are based on a two-compartment model, in which the skin is assumed to be
5 composed of two main layers, the stratum corneum and the viable epidermis, with the
6 stratum corneum as the main barrier. The permeability coefficient of the stratum corneum
7 to a chemical (K_p) is estimated based on physical properties of the chemical, including the
8 molecular weight and $\log K_{ow}$. The model assumes that absorption of material deposited
9 on the skin continues long after the exposure has ended. The series of calculations is
10 summarized in Appendix 13. The formula used to estimate dermal exposure requires AI
11 concentration in mg/L units. Solution concentration was calculated with the following
12 relationships: 2 lbs AI/40 gallons solution = 0.05 lbs AI/gallon = 22,727 mg/gallon and 1
13 gallon = 3.79 L. The concentration of a solution containing 2 lbs AI in 40 gallons is about
14 6,000 mg/L (this concentration is greater than the water solubility of endosulfan; however,
15 products contain additives to increase AI solubility in water).

16
17 Most of the applicator exposure is anticipated to be to hands. However, available
18 information suggests that applicators may also be exposed by splashes or drips on the
19 forearms, torso, and legs (Beauvais, 2004). Although this exposure is not immersion in
20 the same way as hands, in the absence of a better approach these exposed body surfaces
21 were also considered in exposure estimates. Dermal exposure via hands and non-hand
22 areas was assumed to be decreased by 90% in workers wearing the required gloves and
23 coveralls over long-sleeved shirt and pants (Thongsinthusak *et al.*, 1991; Aprea *et al.*,
24 1994). The surface area of both hands was assumed to be 904 cm², the value of combined
25 male and female medians (EPA, 1997). The surface area of the other parts of a worker's
26 body anticipated to be exposed was assumed to be 7,306 cm², the total surface area of
27 chest/stomach, forearms, front of thighs and lower legs based on combined male and
28 female medians (EPA, 1997).

29
30 As with dermal exposure, no inhalation exposure monitoring data are available for
31 workers dipping nursery stock. Inhalation exposure is anticipated to occur, assuming that
32 dipping tanks have a free liquid surface from which chemicals can volatilize into the air.
33 Several models have been proposed to estimate inhalation exposure resulting from
34 volatilization of chemicals from aqueous solutions; three models used by U.S. EPA to
35 estimate exposure to chemicals evaporated from containers or pools of liquid were
36 evaluated in Beauvais (2004). Applicator inhalation exposure was estimated from
37 equations in SWIMODEL (U.S. EPA, 2003). SWIMODEL uses well-accepted screening
38 exposure assessment equations to calculate swimmers' total exposure expressed, modified
39 from equations used by Beech (1980). For inhalation exposure, SWIMODEL assumes
40 100% absorption of inhaled chemical. Exposure estimates are based on chemical intakes
41 only; the model does not address metabolism or excretion (U.S. EPA, 2003). Exposure
42 calculations from SWIMODEL are summarized in Appendix 14. Inhalation exposure
43 estimates assumed a saturated vapor concentration (the vapor concentration calculated by
44 SWIMODEL exceeded this value, and was considered unrealistically high).

STADD for M/Ls are 0.0001 mg/kg/day and 0.002 mg/kg/day for M/Ls handling EC and WP products, respectively. STADD are 41.4 mg/kg/day for applicators (Table 19).

Reentry Exposure

Overview

Representative exposure scenarios for reentry workers were selected as described above in the Exposure Scenarios section. As exposure data were not available for workers reentering crops treated with endosulfan, exposures were estimated from DFR values summarized in Table 10 and TCs from studies with surrogate chemicals (i.e., it was assumed that residue transfer is not chemical-specific).

The major route of pesticide exposure for reentry workers is the dermal route; contact with treated surfaces, especially foliage, causes pesticide residues to be transferred to the skin. The TC is a parameter estimating rate of contact between the worker and treated surface, based on empirical data from studies in which both DFR and dermal exposure have been measured. The TC for an activity is calculated by dividing DFR from a treated crop into the dermal exposure measured for workers performing reentry activities in the crop: $TC (cm^2/hr) = [dermal\ exposure\ (\mu g/hr)]/[DFR\ (\mu g/cm^2)]$. As the TC depends on the intensity of contact with the contaminated surface, it is activity- and surface-specific; however, TCs are only available for a limited number of activities and crops. When specific TCs were not available, TCs from similar crops and activities were used instead.

The absorbed daily dosage (ADD) was calculated as shown in the equation below (Zweig *et al.*, 1984; Zweig *et al.*, 1985), using the dermal absorption rate (DA) of 47.3%, based on Craine (1988); default exposure duration (ED) of 8 hours; and default body weight (BW) of 70 kg (Thongsinthusak *et al.*, 1993). Short-term exposure estimates for fieldworkers are given in Table 21, reported as mg/kg/day (a conversion of 1 mg = 1,000 µg was done).

$$ADD (\mu g / kg / day) = \frac{DA \times DFR (\mu g / cm^2) \times TC (cm^2 / hr.) \times ED (hrs. / day)}{BW(kg)}$$

Reentry workers are not required to wear PPE unless entering fields before expiration of the restricted entry interval (REI). Because a lot of reentry work occurs in hot weather and for several hours each day, PPE is often not worn by fieldworkers unless required for early reentry. Therefore, fieldworker exposure estimates were based on an assumption that no PPE would be worn.

1 **Table 21. Short-term Exposures to Endosulfan Estimated for Reentry Workers**

Exposure scenario	DFR ($\mu\text{g}/\text{cm}^2$) ^a	TC (cm^2/hr) ^b	STADD ($\text{mg}/\text{kg}/\text{day}$) ^c
Almonds, Thinning	0.34	500	0.009
Broccoli, Hand Harvesting	0.22	5,000	0.030
Broccoli, Scouting	0.39	4,000	0.084
Citrus, Thinning	0.34	3,000	0.055
Sweet Corn, Hand Harvesting	0.58	17,000	0.533
Cotton, Scouting	0.58	2,000	0.063
Cucumbers, Hand Harvesting	0.39	2,500	0.053
Grapes, Cane Turning	0.62	10,000	0.335
Lettuce, Scouting	2.00	1,500	0.162
Ornamental Cut Flowers, Hand Harvesting	0.42	7,000	0.159
Ornamental Plants, Hand Harvesting	0.42	400	0.009
Peaches, Thinning	0.34	3,000	0.055
Potatoes, Scouting	0.39	1,500	0.032
Strawberries, Hand Harvesting	0.83	1,500	0.067
Tomatoes, Hand Harvesting	0.39	1,000	0.021
^a Dislodgeable foliar residue (DFR) values from Table 10. ^b Transfer coefficient (TC) is rate of skin contact with treated surfaces. TC references: Cotton scouting (Dong, 1990); citrus and peach (Dawson, 2003); ornamental plants (Klönne <i>et al.</i> , 2000); all other crops (U.S. EPA, 2000a). ^c Short-term Absorbed Daily Dosage (STADD) calculated as described in text. Exposure estimates are for dermal route, as inhalation route assumed to be insignificant. Assumptions include: <ul style="list-style-type: none"> • Exposure duration = 8 hr • Dermal Absorption = 47.3% (Craine, 1988) • Body weight = 70 kg (Thongsinthusak <i>et al.</i>, 1993) 			

2
3 Scouting may occur at any time, and was assumed to occur after all applications.
4 Information about when other reentry activities might occur was obtained from crop
5 profiles prepared by the University of California Cooperative Extension and the Vegetable
6 Research and Information Center (UCCE, 2004; VRIC, 2004), and from the California
7 Farm Worker Activity Profile (CFWAP; Edmiston *et al.*, 1999). CFWAP is a DPR
8 database compiled from a number of sources, including the California Employment
9 Development Department, U.S. Department of Agriculture, California Department of
10 Food and Agriculture and the University of California Cooperative Extension. CFWAP
11 includes information on harvested acreage, cultural practices necessary to grow a crop,
12 and the dates of peak and overall activity periods for work activities such as harvesting
13 and thinning, based on data from 1994. More recent data are not available at the present
14 time.

15
16 Short-term exposures were estimated at the expiration of the 2-day REI for all activities
17 except hand harvesting, which was estimated at the expiration of the pre-harvest intervals
18 (PHI); if PHI was less than 2 days, then the REI was used. For seasonal and annual
19 exposure estimates, it was assumed that workers would enter fields at some average time
20 after the expiration of the REI or PHI, based on how frequently specific activities

generally occur in general crop types (UCCE, 2004). For longer-term exposure estimates it was assumed that workers would not always enter fields at the expiration of the REI. Seasonal and annual exposures were estimated at an assumed average reentry of REI (or PHI, if longer than REI) plus 7 – 10 days. These assumed averages were not based on data; rather, they were based on the reasonable, conservative assumption that workers may enter fields an average of 7 – 10 days after expiration of the REI or PHI. Table 22 contains seasonal, annual, and lifetime exposures estimates for reentry activities.

Table 22. Seasonal, Annual, and Lifetime Exposures to Endosulfan Estimated for Reentry Workers ^a

Exposure scenario	DFR (µg/cm ²) ^b	SADD (mg/kg/day) ^c	AADD (mg/kg/day) ^d	LADD (mg/kg/day) ^e
Broccoli, Hand Harvesting ^f	0.029	0.008	0.001	0.0007
Broccoli, Scouting ^g	0.055	0.012	0.004	0.002
Sweet Corn, Hand Harvesting ^h	0.082	0.075	0.006	0.003
Cotton, Scouting ^f	0.082	0.009	0.001	0.0008
Cucumbers, Hand Harvesting ^f	0.055	0.007	0.001	0.0007
Grapes, Cane Turning ^g	0.26	0.141	0.047	0.025
Lettuce, Scouting ⁱ	0.055	0.004	0.002	0.001
Peaches, Thinning ^f	0.17	0.028	0.005	0.002
Potatoes, Scouting ^j	0.055	0.004	0.002	0.001
Tomatoes, Hand Harvesting ^g	0.17	0.009	0.003	0.002

^a No seasonal, annual, or lifetime exposure estimates were prepared for workers reentering treated almond or citrus orchards or strawberry fields. Infrequent endosulfan use is reported on these crops

^b Dislodgeable foliar residue (DFR) values from Table 10.

^c Seasonal Average Daily Dosage is a mean estimate of absorbed dose, calculated as described in text. Exposure estimates are for dermal route, as inhalation route assumed to be insignificant. Transfer coefficients are given in Table 21.

^d Annual Average Daily Dosage = SADD x (annual use months per year)/(12 months in a year).

^e Lifetime Average Daily Dosage = AADD x (40 years of work in a lifetime)/(75 years in a lifetime).

^f Annual exposure estimate based on high-use period of 2 months, based on data from DPR (2006b).

^g Annual exposure estimate based on high-use period of 4 months.

^h Annual exposure estimate based on high-use period of 1 month.

ⁱ Annual exposure estimate based on high-use period of 5 months.

^j Annual exposure estimate based on high-use period of 6 months.

Most reentry activities are not expected to result in pesticide exposure throughout the year. This is true because pesticides like endosulfan are not necessarily applied all year in all crops, and because many activities are performed only seasonally. To estimate when endosulfan applications might occur throughout the year, five-year averages were plotted of monthly PUR data (numbers of acres treated) for endosulfan applications to the crops of interest in one or more high-use counties. These average use patterns were compared to information about when reentry activities might occur. Annual exposure to endosulfan is assumed to be limited to the months when activities overlap relatively high use (defined as 5% or more of annual use each month).

Thinning Almonds

The REI following endosulfan applications to almonds is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 1,500 cm²/hr (U.S. EPA, 2000a). The STADD is 0.009 mg/kg/day.

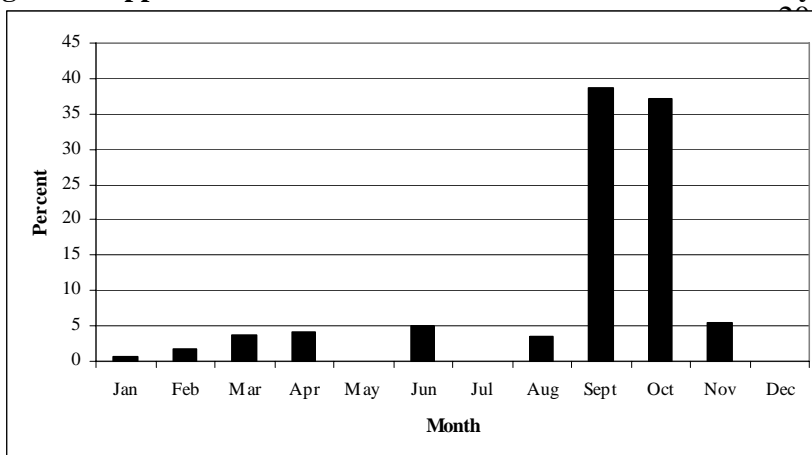
Examination of PUR data shows that endosulfan is infrequently applied to almonds and other tree nuts (DPR, 2006b; data not shown). Therefore, seasonal, annual and lifetime exposures to endosulfan are not anticipated to occur during activities in these crops.

Hand Harvesting Broccoli

The PHI following endosulfan applications to broccoli is 7 days. For exposure estimates, the estimated DFR 7 days post-application was used, as well as a TC of 5,000 cm²/hr (U.S. EPA, 2000a). The STADD is 0.030 mg/kg/day.

Based on information in CFWAP (Edmiston *et al.*, 1999), broccoli in the San Joaquin Valley is harvested October – March (late fall through early spring). Figure 8 summarizes all applications of endosulfan to broccoli in Fresno County, based on numbers of acres treated each month for the most recent five years for which data are available.

Figure 8. Applications of Endosulfan to Broccoli in Fresno County, 2000 – 2004^a



^a Percent calculations based on acres treated (DPR, 2006b; queried January 27, 2006).

The majority of use shown in Figure 8 occurred in June and September through November (i.e., more than 5% of annual use occurred during each of these months), which overlaps the typical harvest period by two months (in October and November). Annual exposure was estimated to occur during these two months.

Scouting Broccoli

The REI following endosulfan applications to broccoli is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 4,000 cm²/hr (U.S. EPA, 2000a). The STADD is 0.084 mg/kg/day.

Scouting may occur at any time, and was assumed to potentially occur following pesticide use (e.g., to confirm efficacy of the application). The majority of endosulfan use on broccoli occurs in June and September through November (Figure 8). Annual exposure was estimated to occur during these four months.

Thinning Citrus

The REI following endosulfan applications to citrus is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 3,000 cm²/hr (Dawson, 2003). The STADD is 0.055 mg/kg/day.

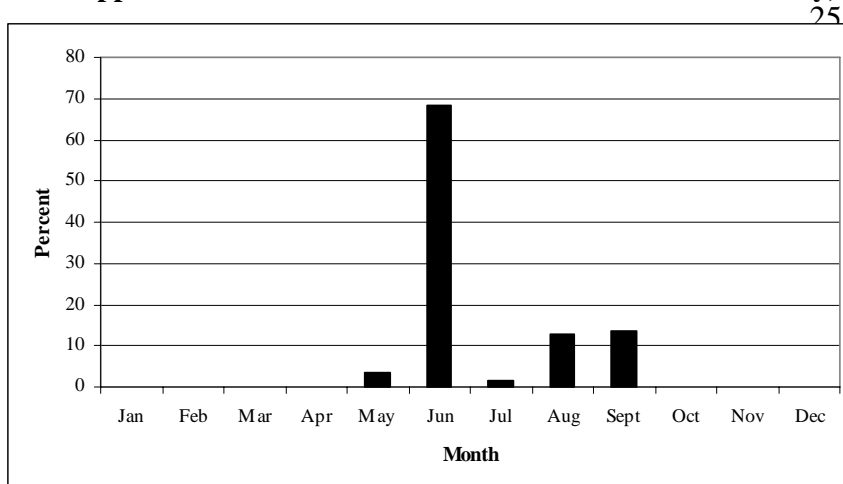
Examination of PUR data shows that endosulfan is infrequently applied to citrus (DPR, 2006b; data not shown). Therefore, seasonal, annual and lifetime exposures to endosulfan are not anticipated to occur during activities in these crops.

Hand Harvesting Sweet Corn

The PHI following endosulfan applications to sweet corn is one day. However, the REI is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 17,000 cm²/hr (U.S. EPA, 2000a). The STADD is 0.533 mg/kg/day.

Based on a crop profile for sweet corn in California (UCCE, 2004), spring corn is generally harvested from April through June; fall corn is generally harvested in November and December. Figure 9 summarizes all applications of endosulfan to sweet corn in Fresno County, based on numbers of acres treated each month for the most recent five years for which data are available.

Figure 9. Applications of Endosulfan to Sweet Corn in Fresno County, 2000 – 2004^a



^a Percent calculations based on acres treated (DPR, 2006b; queried January 26, 2006).

Figure 9 shows that endosulfan was not applied during the fall corn harvest period. However, applications occurred during the spring harvest period (in May and June). Few acres were treated in May (15 acres, or 6 ha, was the mean area treated in May), suggesting that harvester exposure to endosulfan is unlikely in May. The most acres each

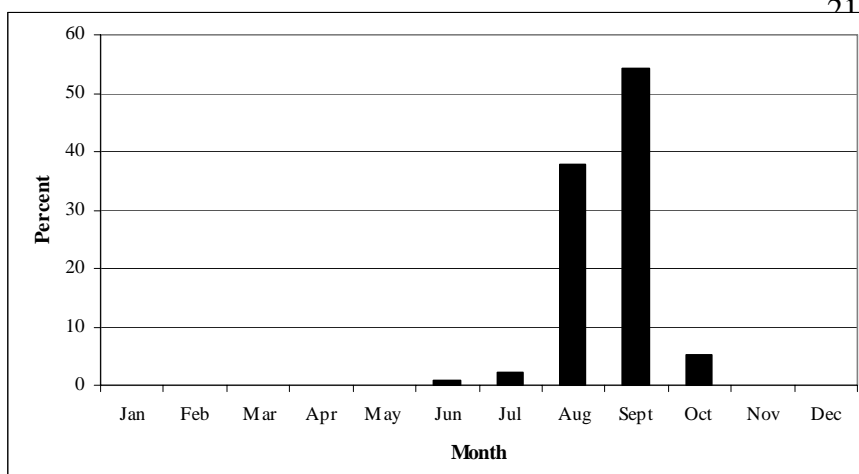
year were treated in June (average: 276 acres or 112 ha). For annual exposure estimates, it was assumed that workers were exposed on each workday in June.

Scouting Cotton

The REI following endosulfan applications to cotton is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used. Transfer factors were derived from a series of studies in which several organophosphates were applied to cotton (Ware *et al.*, 1973, 1974, 1975). Geometric mean transfer factors were computed for bare hands (950 cm²/hr), the clothed upper body (102 cm²/hr), and the clothed lower body (964 cm²/hr). The potential dermal transfer factor for the whole body of cotton scouts (2,000 cm²/hr) was calculated by summing these individual geometric mean transfer factors (Dong, 1990). STADD for scouting in cotton is 0.063 mg/kg/day.

Scouting may occur at any time, and was assumed to potentially occur following pesticide use. Figure 10 summarizes all applications of endosulfan to cotton in Kern and Kings counties, based on numbers of acres treated each month for the most recent five years for which data are available. The majority of endosulfan use on cotton occurs August and September (Figure 10). Annual exposure was estimated to occur during these two months.

Figure 10. Applications of Endosulfan to Cotton in Kern and Kings Counties, 2000 – 2004 ^a



^a Percent calculations based on acres treated (DPR, 2006b; queried January 26, 2006).

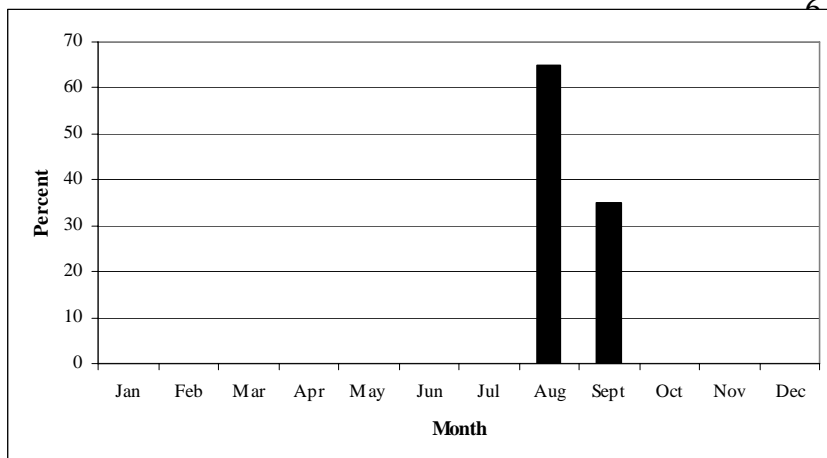
Hand Harvesting Cucumbers

The PHI following endosulfan applications to cucumbers is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 2,500 cm²/hr (U.S. EPA, 2000a). The STADD is 0.053 mg/kg/day.

Based on a crop profile for hand-harvested cucumbers in California (UCCE, 2004), in the Central Valley harvesting generally occurs in August through October. Figure 11 summarizes all applications of endosulfan to cucumbers in Colusa County, based on numbers of acres treated each month for the most recent five years for which data are

available. Figure 11 shows that nearly all endosulfan applications occurred in August and September, during the early part of the typical harvest period. Annual exposure was estimated to occur during these two months.

Figure 11. Applications of Endosulfan to Cucumbers in Colusa County, 2000 – 2004 ^a



^a Percent calculations based on acres treated (DPR, 2006b; queried January 26, 2006).

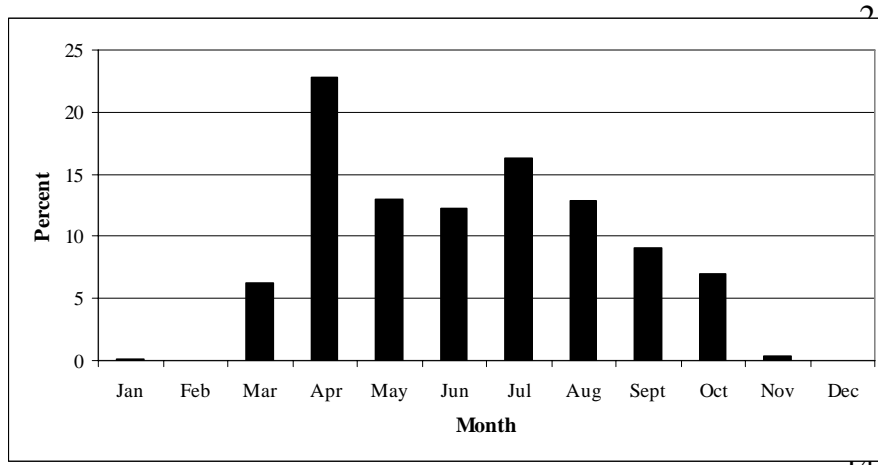
Cane Turning/Leaf Pulling in Grapes

The REI following endosulfan applications to grapes is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 10,000 cm²/hr (U.S. EPA, 2000a). The STADD is 0.335 mg/kg/day.

Based on information in CFWAP (Edmiston *et al.*, 1999), leaf pulling in table grapes and wine grapes in the San Joaquin Valley occurs from April – July. Figure 12 summarizes all applications of endosulfan to grapes in Kern, Kings and Tulare counties, based on numbers of acres treated each month for the most recent five years for which data are available.

Figure 12 shows that most use occurred from March through October (i.e., more than 99% of annual use occurred in this interval), which completely overlaps the typical activity period for leaf pulling and cane turning. Annual exposure was estimated to occur during the four months that leaf pulling is typically done (April – July).

1 **Figure 12. Use of Endosulfan on Grapes in Kern, Kings and Tulare Counties, 2000 – 2004 ^a**



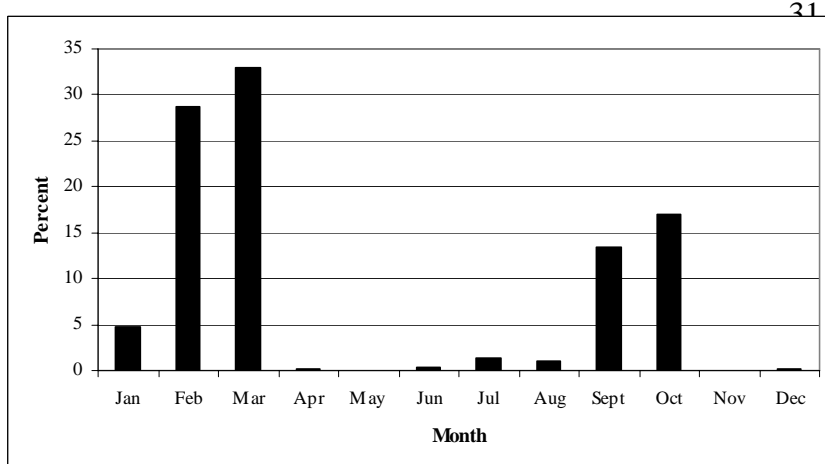
15 ^a Percent calculations based on acres treated (DPR, 2006b; queried January 26, 2006).

17 Scouting Lettuce

18 The REI following endosulfan applications to lettuce is 2 days. To calculate exposure
 19 estimates, a DFR of 2.0 $\mu\text{g}/\text{cm}^2$ was used, as well as a TC of 1,500 cm^2/hr (U.S. EPA,
 20 2000a). The STADD is 0.162 $\text{mg}/\text{kg}/\text{day}$.

21
 22 Scouting may occur at any time, and was assumed to potentially occur following pesticide
 23 use. Figure 13 summarizes all applications of endosulfan to lettuce in Fresno County,
 24 based on numbers of acres treated each month for the most recent five years for which
 25 data are available. The majority of annual endosulfan use on lettuce occurs in two peaks,
 26 one from January through March and one from September through October; these five
 27 months account for about 97% of annual applications (Figure 13). Annual exposure was
 28 estimated to occur during these five months.

30 **Figure 13. Applications of Endosulfan to Lettuce in Fresno County, 2000 – 2004 ^a**



47 ^a Percent calculations based on acres treated (DPR, 2006b; queried January 26, 2006).

Hand Harvesting Ornamentals - Flowers

There is no PHI specified following endosulfan applications to ornamental plants, as these are not used for food (PHI are based on residue levels in food crops). The REI following endosulfan applications is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 7,000 cm²/hr (U.S. EPA, 2000a). The STADD is 0.159 mg/kg/day.

Examination of PUR data suggests that endosulfan is infrequently applied to nursery and greenhouse-grown flowers (DPR, 2006b; data not shown). Therefore, seasonal, annual and lifetime exposures to endosulfan are not anticipated to occur during activities in these crops.

Hand Harvesting Ornamental Plants – Trees and Shrubs

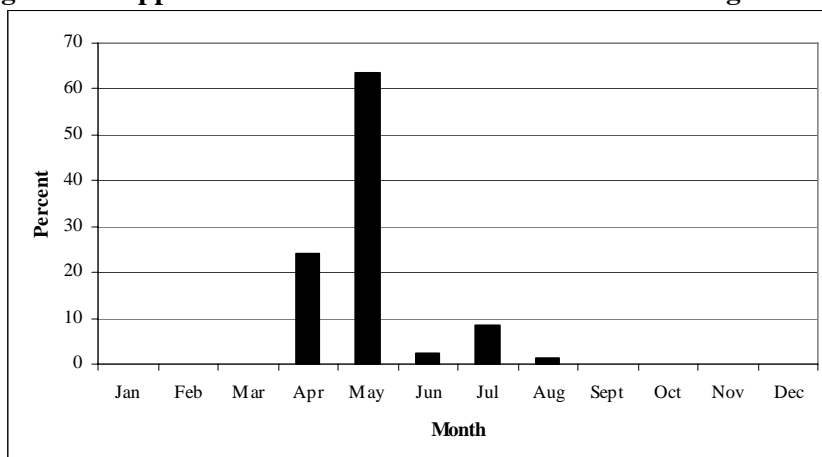
There is no PHI specified following endosulfan applications to ornamental plants, as these are not used for food (PHI are based on residue levels in food crops). The REI following endosulfan applications is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 400 cm²/hr (Klonne *et al.*, 2000). The STADD is 0.009 mg/kg/day.

Examination of PUR data suggests that endosulfan is infrequently applied to container-grown ornamentals (DPR, 2006b; data not shown). Therefore, seasonal, annual and lifetime exposures to endosulfan are not anticipated to occur during activities in these crops.

Thinning Peaches

The REI following endosulfan applications to peaches is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 3,000 cm²/hr (Dawson, 2003). STADD is 0.055 mg/kg/day.

Figure 14 summarizes all applications of endosulfan to peaches in Fresno County, based on numbers of acres treated each month for the most recent five years for which data are available, 2000-2004 (DPR, 2006b; queried January 26, 2006). The majority of annual endosulfan use on peaches occurs in two peaks, one from April through May and another in July; these three months account for 95% of annual applications (Figure 14). Annual exposure was estimated to occur during these three months.

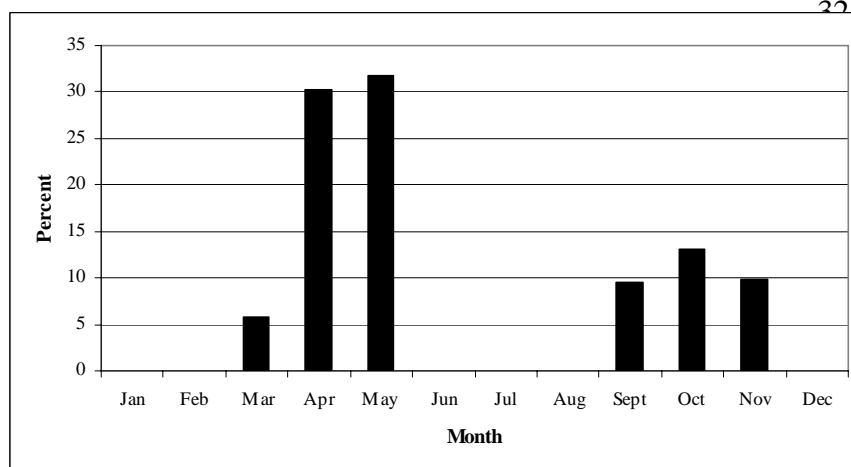
Figure 14. Applications of Endosulfan to Peaches in Los Angeles County, 2000 – 2004 ^a

^a Percent calculations based on acres treated (DPR, 2006b; queried January 26, 2006).

Scouting Potatoes

The REI following endosulfan applications to potatoes is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 1,500 cm²/hr (U.S. EPA, 2000a). The STADD is 0.032 mg/kg/day.

Scouting may occur at any time, and was assumed to potentially occur following pesticide use. Figure 15 summarizes all applications of endosulfan to potatoes in Kern County, based on numbers of acres treated each month for the most recent five years for which data are available. Endosulfan use on potatoes occurs in two peaks, one from March through May and another from September through November (Figure 15). Annual exposure was estimated to occur during these six months.

Figure 15. Applications of Endosulfan to Potatoes in Kern County, 2000 – 2004 ^a

^a Percent calculations based on acres treated (DPR, 2006b; queried January 26, 2006).

Hand Harvesting Strawberries

The PHI following endosulfan applications to strawberries is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 1,500 cm²/hr (U.S. EPA, 2000a). The STADD is 0.067 mg/kg/day.

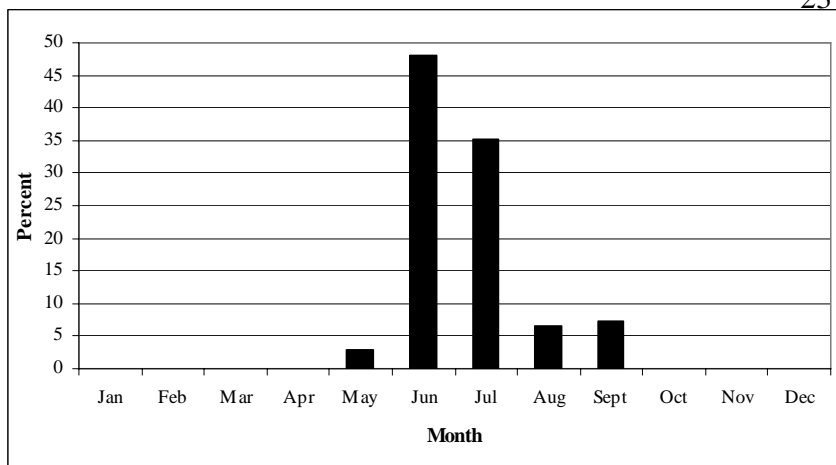
Examination of PUR data shows that endosulfan is infrequently applied to strawberries (DPR, 2006b; data not shown). Therefore, seasonal, annual and lifetime exposures to endosulfan are not anticipated to occur during reentry in strawberries.

Hand Harvesting Tomatoes

The PHI following endosulfan applications to tomatoes is 2 days. For exposure estimates, the estimated DFR 2 days post-application was used, as well as a TC of 1,000 cm²/hr (U.S. EPA, 2000a). The STADD is 0.021 mg/kg/day.

Based on information in CFWAP (Edmiston *et al.*, 1999), tomatoes are harvested in Fresno County from May through November. Figure 16 summarizes all applications of endosulfan to tomatoes in Fresno County, based on numbers of acres treated each month for the most recent five years for which data are available. Figure 16 shows that most use occurred from June through September (i.e., about 97% of annual use occurred in this interval). This completely overlaps the typical activity period for harvesting. Annual exposure was estimated to occur during these four months.

Figure 16. Applications of Endosulfan to Tomatoes in Fresno County, 2000 – 2004 ^a



^a Percent calculations based on acres treated (DPR, 2006b; queried January 27, 2006).

Mitigation Measures Proposed by U.S.EPA

Several measures were proposed by U.S. EPA (2002a) to mitigate dietary, occupational, and environmental risks of endosulfan use. Proposed measures that would affect handler and reentry exposure estimates are summarized in Appendix 15. Revised exposure estimates, reflecting anticipated exposures if these measures were implemented, are summarized in Appendix 15.

Proposed mitigation measures include deleting endosulfan use on several crops; deleting uses of endosulfan WP products on several other crops; forbidding aerial applications of WP products on several crops; requiring closed M/L systems for aerial applications of EC endosulfan products on several crops; and requiring closed cabs for airblast applications to tree crops. In addition, all WP products must be in water-soluble packaging, which would likely preclude the use of WP products by M/L/As using LPHWs. Maximum application rates, seasonal application rates, and numbers of applications allowed each season were reduced on many crops. Finally, REIs were increased for nearly all crops. Refer to Appendix 15 for a list of crops and changes.

Many of the mitigation measures proposed in U.S. EPA (2002a) are still pending. In September 2004, U.S. EPA released a progress report on regulatory decisions relating to the reregistration of several AIs, including endosulfan (U.S. EPA, 2004b). According to this report, U.S. EPA has requested several studies from registrants in data call-ins issued in August 2004. Results from these studies, as well as product labels revised in response to mitigation measures proposed in the RED, are anticipated to be submitted to U.S. EPA in 2005 (U.S. EPA, 2004b).

Ambient Air and Bystander Exposures

Ambient air and application site air monitoring detected endosulfan, suggesting that the public may be exposed to airborne endosulfan. Individuals might be exposed to endosulfan if they are working adjacent to fields that are being treated or have recently been treated (bystander exposure). In addition, air monitoring conducted in Fresno County suggests that airborne endosulfan exposures are possible in areas that are far from application sites (ambient air exposure). Public exposure to airborne endosulfan was estimated based on monitoring studies of endosulfan at application sites and in ambient air. See the Environmental Concentrations section for study details.

Ambient air

Table 23 summarizes ambient air exposure estimates to endosulfan based on ambient air monitoring in Fresno County, as well as on inhalation rate defaults documented by Andrews and Patterson (2000). These defaults are listed in Table 23, along with the original references. Seasonal and annual exposures were estimated according to DPR policy, based on the arithmetic mean of concentrations from Site SJ, where the highest concentrations were measured. Short-term exposures to ambient air are anticipated to be equal to or less than the acute bystander exposure, which addresses exposure of an individual who is adjacent to an application.

Table 23. Ambient Air and Bystander Exposure Estimates for Persons Exposed to Endosulfan^a

Site	Air concentration ^b (µg/m ³)		STADD ^c (mg/kg/day)		Seasonal ADD ^d (mg/kg/day)		Annual ADD ^e (mg/kg/day)	
	Short-term	Long-term	Infants	Adults	Infants	Adults	Infants	Adults
<u>Ambient Air</u>								
Site SJ ^f	NA ^g	0.032	NA	NA	0.000019	0.000009	0.000011	0.000005
<u>Bystander</u>								
East Station ^g	2.10	0.78	0.00124	0.00059	0.00046	0.00022	0.000038	0.000018

^a Estimates based on total endosulfan concentrations from monitoring conducted in Fresno County (ambient air) in 1996, and San Joaquin County (application site for bystander exposure) in 1997 (ARB, 1998).

^b Arithmetic mean and standard deviation (SD). Calculated using ½ limit of quantitation (LOQ) for samples <LOQ. See Table 12 for endosulfan concentrations in ambient air monitoring, and Table 14 for application site monitoring.

^c Short-Term Absorbed Daily Dosage (mg/kg/day) = (24-hour TWA) x (inhalation rate). Calculation assumptions include:

- Infant inhalation rate = 0.59 m³/kg/day (Layton, 1993; U.S. EPA, 1997)
- Adult inhalation rate = 0.28 m³/kg/day (Wiley *et al.*, 1991; U.S. EPA, 1997; OEHHA, 2000)
- Inhalation absorption is assumed to be 100%

^d Seasonal ADD = (3-day TWA) x (inhalation rate). Calculation assumptions as above.

^e Annual ADD = (Seasonal ADD) x (annual use months per year)/12. Annual ambient air exposure estimates are based on high-use period of 7 months for ambient air, based on use reported in San Joaquin County. Annual bystander exposure estimates are based on high-use period of 1 month, as repeated applications adjacent to any one individual are considered unlikely for longer intervals.

^f Site SJ = San Joaquin Elementary School, San Joaquin. This was the site with most samples above the LOQ (Table 12).

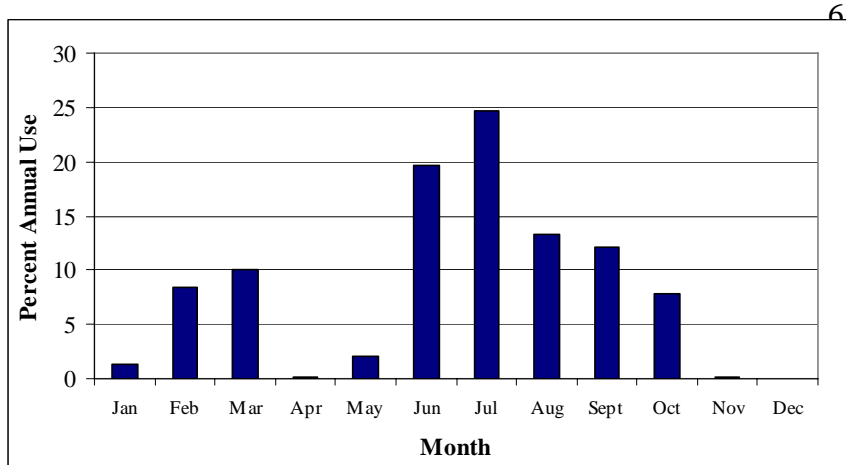
^g East station was the application air monitoring site with the highest endosulfan TWA concentrations (Table 14). Short-term exposure estimates were multiplied by 1.67, because the application rate used in the study (1.5 lbs AI/acre, or 1.7 kg AI/ha) was below the maximum rate allowed on apples (2.5 lbs AI/acre, or 2.8 kg AI/ha). Seasonal and annual exposure estimates were not adjusted for differences in application rate.

Figure 17 summarizes monthly use of endosulfan in Fresno County for the past five years available. The use pattern shown in Figure 17, in which the highest use occurred in June and July and most use occurred during seven months (February – March and June – October), is similar to the use pattern observed during ambient air monitoring in 1996 (Figure 3). Annual exposure estimates shown in Table 23 assumed exposure occurred during the seven high-use months shown in Figure 17. SADD is 0.000019 mg/kg/day for infants and 0.000009 mg/kg/day for adults. Annual ADD is 0.000011 mg/kg/day for infants and 0.000005 mg/kg/day for adults.

Lee *et al.* (2002) estimated subchronic (> 14 days) and chronic (> 1 year) exposures for children and adults. For children, subchronic exposure estimates ranged 0.014 – 0.070 µg/kg/day and chronic exposure estimates ranged from 0.0006 – 0.0035 µg/kg/day. For adults, subchronic exposure estimates ranged from 0.006 – 0.049 µg/kg/day and chronic exposure estimates ranged from 0.0003 – 0.0014 µg/kg/day (Lee *et al.*, 2002). Seasonal exposure estimates in Table 23 are in the range of the subchronic estimates reported by Lee *et al.* (2002). The annual ADD estimates reported in Table 23 are higher than the chronic estimates, as they are based on assumed constant inhalation rates and ambient air

concentrations for 7 months, while the probabilistic estimates reported by Lee *et al.* (2002) assumed a gamma distribution for inhalation rates and a lognormal distribution for air concentrations.

Figure 17. Monthly Use of Endosulfan in Fresno County, 2000 – 2004 ^a



^a Percent calculations based on pounds applied by all methods to all crops in Fresno County (DPR, 2006b; queried January 26, 2006).

Bystanders at application sites

To estimate bystander exposure to endosulfan in air, data were used from application site monitoring in a 1997 study in San Joaquin County (ARB, 1998). Stations (one each east, west and south, and two north) were located 8.2 - 16 m from the edge of the orchard. The application took place on April 8 between 5:45 and 7:45 AM. Table 14 summarizes endosulfan concentrations during several monitoring periods at each of these stations. Bystander exposure estimates are given in Table 23. The 24-hour time-weighted average (TWA) for the east monitoring station ($TWA = 1.26 \mu\text{g}/\text{m}^3$) was used to estimate exposure. The application rate used in the study (1.5 lbs AI/acre, or 1.7 kg AI/ha) was below the maximum rate allowed on apples (2.5 lbs AI/acre, or 2.8 kg AI/ha), suggesting that bystanders near fields where the maximum allowed rate is used would be exposed to higher concentrations than were found by ARB (1998). Exposure is assumed to be directly proportional to application rate, and exposure estimates were multiplied by 1.67 (2.5 divided by 1.5). STADD for bystanders was 0.00124 mg/kg/day for infants and 0.00059 mg/kg/day for adults.

Bystanders are generally anticipated to experience only acute exposures, with concentrations greater than ambient for less than one week at a time. Nevertheless, effects of each exposure might persist longer than a week, suggesting that repeated exposures occurring within a few weeks of one another might constitute seasonal and annual exposures. Endosulfan use is allowed just 1-3 times per year on most crops, suggesting that even if more than one field is treated in an area that seasonal and annual bystander exposures are unlikely. However, potatoes and tomatoes may receive up to six endosulfan applications per year, with no minimum interval specified between

applications. Seasonal and annual exposure estimates were not adjusted for differences in application rate, as repeated applications at the maximum rate are considered unlikely. Estimates were based on an assumed high-use period of 1 month, as repeated applications adjacent to any one individual are considered unlikely for longer intervals. Seasonal ADD estimates for bystander exposures to endosulfan were 0.00046 mg/kg/day for infants and 0.00022 mg/kg/day for adults. Annual ADD estimates for bystanders were 0.000038 mg/kg/day for infants and 0.000018 mg/kg/day for adults.

Swimmer Exposures

As summarized previously in the Environmental Concentrations section, endosulfan residues have been detected in surface waters in California. Exposures of adults and children swimming in surface waters were estimated based on equations listed in U.S. EPA (2003). These calculations are summarized below.

The endosulfan dose absorbed dermally was estimated with the following equation:

$$ADR = C_w * SA * ET * K_p * CF1$$

where ADR = absorbed dose rate (mg/day); C_w = concentration of AI in water (mg/L); SA = surface area exposed (cm^2); ET = exposure time (hours/day); K_p = permeability coefficient; and CF1 = volume unit conversion factor ($\text{L}/1,000 \text{ cm}^3$). The 95th percentile total endosulfan concentration of 0.15 $\mu\text{g/L}$ ($C_w = 0.00015 \text{ mg/L}$), calculated from the 95th percentile concentrations reported in Table 15, was used in estimating short-term swimmer exposure (STADD). For long-term exposures, the median total endosulfan concentration of 0.010 $\mu\text{g/L}$ ($C_w = 0.000010 \text{ mg/L}$) was calculated from the 50th percentile concentrations in Table 15. Default values were used for SA and ET. For adults, SA = 18,150 cm^2 and for a 6 year-old child, SA = 8,545 cm^2 (U.S. EPA, 1997). For short-term exposures, the ET was assumed to be 5 hours (U.S. EPA, 2003). For long-term exposures, the ET was assumed to average 2.3 hours/day for children and 1.3 hours/day for adults (U.S. EPA, 2003). Weather was assumed to be suitable for outdoor swimming for 100 days each year. The permeability coefficient for endosulfan calculated in Appendix 13, 0.0112 cm/hr , was used for K_p .

The endosulfan dose absorbed from incidental non-dietary ingestion was estimated with the following equation:

$$PDR = C_w * IR * ET$$

where PDR = potential dose rate via oral exposure per event (mg/event); C_w = concentration of AI in water (mg/L); IR = ingestion rate of pool water (L/hour); and ET = exposure time (hours/event). In calculating PDR, the same values were used for C_w and ET as those used in calculating ADR. The ingestion rate (IR) was assumed to be 0.05 L/hr for children and 0.025L/hr for adults (U.S. EPA, 2003).

Both STADD and SADD were calculated from ADR and PDR by dividing by default body weights of 70 kg for an adult (Thongsinthusak *et al.*, 1993) and 24 kg for a 6 year-

old child (U.S. EPA, 1997). Exposure estimates are summarized in Table 24. Inhalation exposure was assumed to be negligible, and was not included in swimmer exposure estimates. The total exposure was calculated by summing dermal and non-dietary ingestion exposure estimates. Total STADD is 0.00027 mg/kg/day for adults and 0.00156 mg/kg/day for children.

Table 24. Exposures to Endosulfan Estimated for Swimmers in Surface Waters ^a

Exposure scenario	STADD (mg/kg/day) ^b	SADD (mg/kg/day) ^c	AADD (mg/kg/day) ^d	LADD (mg/kg/day) ^e
Adult Dermal ^f	0.00000218	0.0000000378	0.0000000103	0.00000000517
Adult Non-Dietary Ingestion ^g	0.000268	0.00000464	0.00000127	0.000000636
Adult Total ^h	0.00027	0.00000468	0.00000128	0.000000641
Child Dermal ^f	0.00000299	0.0000000917	0.0000000251	0.0000000126
Child Non-Dietary Ingestion ^g	0.00156	0.0000479	0.0000131	0.00000656
Child Total ^h	0.00156	0.0000480	0.0000131	0.00000657

^a Exposure estimates include dermal and ingestion routes, as inhalation route assumed to be insignificant. Endosulfan concentrations used in exposure estimates are from the Department of Pesticide Regulation Surface Water Database (DPR, 2004). The 95th percentile total endosulfan concentration of 0.15 µg/L, calculated from the 95th percentile concentrations reported in Table 15, was used in estimating short-term exposure. For long-term exposures, the median total endosulfan concentration of 0.010 µg/L was calculated from the 50th percentile concentrations reported in Table 15.

^b Short-term Absorbed Daily Dosage (STADD) calculated as described in text. Swimmers were assumed to swim for 5 hours in a day (U.S. EPA, 2003). Body weight assumed to be 70 kg for adult (Thongsinthusak *et al.*, 1993) and 24 kg for child (U.S. EPA, 1997).

^c Seasonal Average Daily Dosage is a mean estimate of absorbed dose, calculated as described in text. Swimmers were assumed to swim for an average of 2.3 hours/day for children and 1.3 hours/day for adults (U.S. EPA, 2003).

^d Annual Average Daily Dosage = SADD x (100 days)/(365 days in a year).

^e Lifetime Average Daily Dosage = AADD x (35 years of swimming)/(75 years in a lifetime).

^f Dermal exposure estimates assume a median surface area of 18,150 cm² for adult and 8,565 cm² for a child (U.S. EPA, 1997).

^g Incidental non-dietary ingestion assume an ingestion rate of 0.05 L/hour for children and 0.025 L/hr for adults (U.S. EPA, 2003).

EXPOSURE APPRAISAL

Handler Exposure Estimates

PHED

Exposure estimates for handlers were based on surrogate data, due to lack of acceptable, chemical-specific data. Exposure monitoring data from PHED were used to estimate handler exposures for the various application methods. PHED incorporates exposure data from many studies, each with a different minimum detection level for the analytical method used to detect residues in the sampling media. Moreover, as the detection of

1 dermal exposure to the body regions was not standardized, some studies observed
2 exposure to only selected body parts. Consequently, the subsets derived from the
3 database for dermal exposure may have different numbers of observations for each body
4 part, a fact which complicates interpretation of values taken from PHED. However, use
5 of PHED data provided the best exposure estimates possible. U.S. EPA also relied on
6 PHED data for handler exposure estimates (U.S. EPA, 2002b).

7
8 Upper confidence limits are used for seasonal and chronic estimates based on PHED. For
9 these exposures, UCLs are used not because DPR believes that exposures are consistently
10 greater than the population mean, but because available data are so sparse that it is likely
11 that the sample mean is not close to the true population mean. In exposure monitoring,
12 ranges of sample results can be quite broad, and can include values that are substantially
13 higher than sample means (Grover *et al.*, 1986; Vercruysse *et al.*, 1999). Some studies
14 have reported sample ranges that span as much as three orders of magnitude (e.g., Hines *et*
15 *al.*, 2001). Thus, it is apparent that handlers could have exposures well above sample
16 means; such estimates are not unreasonable. PHED data in particular pose difficulties
17 because they are poorly characterized for the user, confounding assessment of the match
18 between any given subset and the exposure scenario it is intended to represent. UCLs are
19 used by DPR to address concerns specific to PHED (Powell, 2002).

20
21 Data quality grades in PHED have been assigned based on Quality Assurance/Quality
22 Control data provided in exposure study reports. Grades A and B are high-quality grades,
23 with lab recoveries of 90-110% and 80-100%, respectively (field recoveries range 70-
24 120% and 50-120%); grade C represents moderate quality, with lab and field recoveries of
25 70-120% and 30-120%, respectively; E is the lowest quality grade, and is assigned to
26 PHED data that do not meet basic quality assurance (U.S. EPA, 1998a). Data quality
27 grades for each PHED data set used in exposure estimates are summarized in the first
28 table of each appendix. Data quality was generally high to moderate in the data sets used
29 to generate exposure estimates.

30
31 The appendices also summarize numbers of observations contained in each PHED subset.
32 Subsets for M/L/A using low-pressure hand wand or backpack sprayer had 9-11
33 observations for each body part. This is a very small number of observations, increasing
34 the uncertainty that estimates generated from these subsets have captured the full range of
35 variability occurring even in typical uses. In some cases, all data within a subset might
36 have been collected in a single study. Other subsets that are rather small include M/L/A
37 using high-pressure hand wand (7-13 observations); M/L handling WP in WSP (6-15
38 observations); and aerial applicator (9-17 observations).

40 DPR and U.S. EPA Estimates

41 U.S. EPA also uses PHED to estimate handler exposure; however, U.S. EPA approaches
42 PHED data somewhat differently than DPR. First, as explained in U.S. EPA's policy for
43 use of PHED data (U.S. EPA, 1999): "Once the data for a given exposure scenario have
44 been selected, the data are normalized (i.e., divided by) by the amount of pesticide
45 handled resulting in standard unit exposures (milligrams of exposure per pound of active

ingredient handled). Following normalization, the data are statistically summarized. The distribution of exposure values for each body part (i.e., chest upper arm) is categorized as normal, lognormal, or “other” (i.e., neither normal nor lognormal). A central tendency value is then selected from the distribution of the exposure values for each body part. These values are the arithmetic mean for normal distributions, the geometric mean for lognormal distributions, and the median for all “other” distributions. Once selected, the central tendency values for each body part are composited into a “best fit” exposure value representing the entire body.” In other words, U.S. EPA uses various central tendency estimates (often the geometric mean or median, as PHED data rarely follow a normal distribution), while DPR believes the arithmetic mean is the appropriate statistic regardless of the sample distribution (Powell, 2003). Second, DPR uses a 95th percentile upper bound estimate for short-term exposure estimates, while U.S. EPA uses a central tendency estimate for all exposure durations. Third, as explained in the Exposure Assessment section, DPR calculates 90% UCLs for both upper bound and mean exposures, while U.S. EPA does not (note: DPR’s policies for handling PHED data have been reviewed informally and are currently under formal review by a statistician at the University of California). The differences between short-term exposure estimates calculated according to DPR and U.S. EPA policies are summarized in Table 25 for an example scenario, aerial applicator.

In Table 25, the exposure rate estimated by U.S. EPA is 5.068 µg AI/lb handled (U.S. EPA, 2002b); the exposure rate calculated according to DPR policy is 133.286 µg AI/lb handled. These values differ substantially, not only for the reasons explained above, but also because U.S. EPA assumes use of closed cockpits in all aerial exposure estimates; if planes with open cockpits can be used, U.S. EPA policy is to require an additional 10-fold safety factor in the risk calculation (U.S. EPA, 1998b). If DPR were to assume a closed cockpit, the total exposure rate would be 46.7 µg AI/lb handled; this estimate was included in Table 25 to show the extent to which assumption of an open cockpit affects DPR exposure estimates. The most recent information available about equipment used by aerial applicators shows that open cockpits are relatively rare, but may still be used (NAAA, 2004).

The STADD estimated by DPR is 0.790 mg/kg/day, and the corresponding exposure estimate calculated by U.S. EPA is 0.1312 mg/kg/day. If closed cockpits were required, the DPR exposure estimate would only be 0.280 mg/kg/day, slightly more than twice the U.S. EPA estimate. No chemical-specific exposure monitoring data were available for comparison with these estimates.

Although there are differences in how DPR and U.S. EPA calculate exposure estimates from PHED, there are also similarities. For example, groundboom applicator data in PHED are from studies in which subjects did not wear gloves. When using these data, both DPR and U.S. EPA (2002b) assign a 90% protection factor for exposure reduction for workers wearing gloves as required on product labels.

Table 25. Comparison of Aerial Applicator Exposure to Endosulfan Estimated From the Pesticide Handler Exposure Database by DPR and U.S. EPA Policy

Exposure estimate	Exposure rate (μg AI/lb handled) ^a	STADD (mg/kg/day) ^b
DPR estimate used in this Exposure Assessment (open cockpit) ^c	133	0.790
DPR's estimate if closed cockpit were required ^d	46.7	0.280
From PHED, according to U.S. EPA policy (closed cockpit) ^e	5.068	0.1312
^a Total exposure rate, dermal plus inhalation, based on data in the Pesticide Handlers Exposure Database (PHED). ^b Short-Term Absorbed Daily Dosage (STADD) estimates assumed an 8-hour workday. Amount treated was assumed by both DPR and U.S. EPA to be 350 acres (142 ha) treated/day (U.S. EPA, 2001). Body weight was assumed to be 70 kg by DPR (Thongsinthusak <i>et al.</i> , 1993) and U.S. EPA (2002b). ^c Department of Pesticide Regulation (DPR) use of PHED data described in Exposure Assessment section. Exposure rate and STADD are from Table 17. Estimates assumed open-cockpit aerial application, with applicator wearing respirator but not wearing gloves. Assumed application rate was 2.5 lbs AI/acre (2.8 kg AI/ha), maximum rate on tree nuts in California. Dermal absorption assumed to be 47.3% (Craine, 1988), and inhalation absorption assumed to be 100%. ^d Estimate assumptions were the same as above, except that aerial applicators were assumed to use closed cockpit (no respirator use is assumed for closed cockpit). This estimate would be used by DPR if regulations or product labels specified a requirement for closed cockpits, which is not currently the case. ^e U.S. Environmental Protection Agency (U.S. EPA) exposure estimates from Scenario 3 in revised exposure assessment (U.S. EPA, 2002b). Estimates assumed closed-cockpit aerial application, with applicator not wearing gloves or respirator. Assumed application rate was 3.0 lbs AI/acre (3.4 kg AI/ha), maximum rate on pecans; dermal and inhalation absorption factors were not used, as route-specific toxicity data were used in U.S. EPA's risk assessment.		

Nursery Stock Dipping Applicators

Dermal exposure was estimated based on the RAGS-E model, which estimates skin permeability (K_p) to organic chemicals in aqueous solution (U.S. EPA, 2004a). There are many assumptions and uncertainties associated with this and other models that use K_p , some of which were discussed in U.S. EPA (2004a). Additional sources of uncertainty in models based on large and diverse data sets were discussed by Poda *et al.* (2001).

For endosulfan, an AI-specific K_p value was estimated based on an equation derived from a data set of about 200 organic compounds in aqueous solutions. The calculated K_p for endosulfan may be either over- or underestimated; there are not enough data available to be sure. As endosulfan is well within the range of MW and Log K_{ow} in which K_p estimates are considered valid, based on Equations 3.9 and 3.10 in U.S. EPA (2004a), use of this equation is expected to result in a skin permeability estimate that correlates reasonably well with available data.

However, use of K_p with solutions of formulated pesticide products may result in exposure being underestimated, as the formulations contain additives (e.g., solvents, emulsifiers, and surfactants) to increase water solubility of AIs. Numerous studies have shown enhanced dermal penetration of chemicals, including pesticides, when mixed with such additives, as they can alter the barrier properties of the skin (Baynes and Riviere,

1998; Brand and Mueller, 2002; Williams and Barry, 2004). Alternately, flux into the skin could be decreased by additives in the formulation, as has been shown in some cases (Nielsen and Andersen, 2001; Riviere *et al.*, 2001), perhaps by altering how the chemical partitions between solution and skin (van der Merwe and Riviere, 2005). Exposure estimates could be improved if skin permeability measures were made using solutions of formulated products in concentrations that are pertinent to typical product use.

Another uncertainty from the use of K_p in estimating dermal exposure is that skin permeabilities are almost always estimated from *in vitro* rather than *in vivo* data. In an *in vitro* skin permeability test, a section of skin is clamped between two cells, called the "donor cell" and the "receptor cell." The donor solution (in the donor cell) contains the compound of interest; as the compound crosses the membrane it appears in the receptor solution, which is sampled periodically. A known concentration of compound is initially in the donor solution; the rate at which the compound concentration increases in the receptor solution is related to the skin permeability. Extrapolation from *in vitro* data to permeability of skin *in vivo* is problematic because relationships between *in vivo* and *in vitro* test results have not been reliably established for many classes of compounds, and dermal penetration have been shown to vary for compounds that have been tested (Wester and Maibach, 2000; Zendzian and Dellarco, 2003). Nevertheless, these models rely on the assumption that *in vitro* dermal penetration is approximately the same as *in vivo*.

Other assumptions common to these models are that the chemical concentration of water in contact with skin (C_w) is constant; and that absorbed dose is a function of solution concentration, skin permeability, and amount of exposed skin surface. These are reasonable assumptions, but have not been tested for solutions of pesticide products.

Another uncertainty existing in the RAGS-E model is related to the parameters τ and B . Calculations for these parameters rely on many assumptions and limited, surrogate data. The RAGS-E model has undergone some validation, but not with pesticides in formulated products (additives in the pesticide formulations may affect τ and B , as well as K_p).

Estimates of inhalation exposure for workers dipping nursery stock were based on SWIMODEL equations. SWIMODEL estimates pesticides concentrations in air based on conditions that may not be met in the nursery stock dipping scenario. In fact, substantial deviations occur from the assumptions on which the model is based. SWIMODEL relies on water-air partitioning to determine concentration of a chemical in air, using the Henry's Law constant for the chemical. However, Henry's Law constant applies to dilute, single-chemical aqueous solutions only. Staudinger and Roberts (2001) suggest 10,000 mg/L as an upper boundary defining a "dilute" solution under Henry's Law. This concentration is approached in the endosulfan dipping solution (6,000 mg/L). Furthermore, other chemicals present in the pesticide formulation can interact with the pesticide molecules, potentially affecting the partitioning of the AI into air (Staudinger and Roberts, 2001). Because the calculated concentration of AI in air was higher than anticipated at saturation, the estimated saturation concentration was used instead in inhalation exposure calculations; in other words, it was assumed that the AI is present at air-saturating concentrations. Because of this assumption, inhalation exposure is

1 anticipated to be overestimated. In spite of this, the inhalation exposure estimate was
2 substantially below the dermal exposure estimate, and the inhalation contribution to total
3 exposure is considered negligible in this scenario.

4
5 In the absence of exposure monitoring or surrogate data, the results obtained from these
6 models are considered the best estimate of dermal and inhalation exposure.

7 Other Defaults

8 PUR data were used to estimate likely numbers of days workers were exposed, based on
9 the distribution of applications in high-use California counties. These high-use periods
10 describe a recent work history of the handler population, and they probably overestimate
11 the workdays for any single individual. However, they provide the best available data for
12 seasonal and annual exposure estimates.

13
14 Additionally, the numbers of acres treated per day were based on defaults recommended
15 by U.S. EPA (2001). These estimates are expected to be conservative but realistic;
16 however, insufficient data exist to evaluate their accuracy.

17 ***Reentry Exposure Estimates***

18 Acceptable monitoring data were lacking for fieldworker exposures. Exposure estimates
19 for fieldworkers were appropriately based on chemical-specific DFR values; however,
20 crop-specific DFR values were unavailable for most reentry scenarios. Because of this,
21 DFR data from only four crops (grapes, lettuce, melons, and peaches) represented residues
22 in all crops on which endosulfan may be used. The use of data from one crop to represent
23 residues on another introduces uncertainties in exposure estimates. Residues may
24 dissipate at different rates on different crops, due to factors such as leaf topography and
25 physical and chemical properties of leaf surfaces.

26
27 The rate of contact with treated foliage, unlike DFR, is not chemical specific (U.S. EPA,
28 2000b). Transfer coefficient values for various crop activities are readily available, based
29 on studies using other chemicals. Where activity- and crop-specific TCs were not
30 available, defaults based on studies with similar activities and crops were used. These
31 defaults were likely to be health-protective (U.S. EPA, 2000a).

32
33 Additionally, information is lacking about exposures resulting from some activities, such
34 as weeding and roguing (removal of diseased crop plants) in cotton, and how these
35 exposures might compare with those of scouts. Unlike other reentry workers, cotton
36 harvesters work with plants which have been intentionally defoliated; DFR residues
37 therefore cannot be used to estimate harvester exposures. The best available exposure
38 estimate for weeders, rogues and harvesters in cotton is considered to be the estimate
39 provided for cotton scouts. However, no data are available which would allow
40 comparison of exposures between cotton scouts and those of other reentry workers in
41 cotton.

Ambient Air and Bystander Exposure Estimates

Public exposures to airborne endosulfan were estimated based on concentrations of endosulfan in air and assumptions about uptake of endosulfan from the air. No biomonitoring or other exposure monitoring data were available. Exposure estimates were provided for adults for consistency with other scenarios, and for infants, as likely worst-case because infants have the greatest inhalation rate per body weight.

Ambient air exposure estimates were based on monitoring conducted at five sites in Fresno County. The reported concentrations were based on limited monitoring data and must be considered as having some degree of uncertainty. The representativeness of the monitoring sites is unknown. Each site was monitored four days per week for a relatively short (5-week) period. Weekend days were not monitored. It is unknown whether weekdays and weekends differ systematically in numbers of endosulfan applications. Although ambient air monitoring sites were selected based on anticipated nearby endosulfan use, applications of endosulfan were not confirmed. Furthermore, examination of pesticide use data in Fresno County (Figure 3), suggests that while ambient air monitoring performed by ARB (1998) occurred during a high-use period, the highest-use period might not have been monitored. A total of 24,498 lbs endosulfan was used in Fresno County in July 1996, the highest use month that year. In July 2000, however, 30,614 lbs was reported used in Fresno County (DPR, 2006b). Ambient air exposures, based on air monitoring conducted in July and August 1996, might be underestimated.

For bystander exposure estimates, data from the east monitoring station, 6.4 m from the application site, were used as a reasonable worst-case estimate for endosulfan concentration in air for short-term exposure estimates. The 24-hour TWA was multiplied by a factor of 1.67 to account for the difference between the application rate monitored in the study and the maximum allowed application rate for endosulfan. This adjustment assumes that endosulfan concentrations in air are directly proportional to application rate.

Seasonal or annual exposure to application site airborne endosulfan levels were estimated because endosulfan use is allowed up to six times per year on potatoes and tomatoes, suggesting that exposure durations greater than acute are possible. However, occurrences of seasonal and annual bystander exposures are considered to have a low probability because airborne concentrations are anticipated to reach ambient levels within a few days after each application, and even individuals living near one or more application sites and working near others are unlikely to experience exposures above ambient for more than a few days. Airborne concentrations of active ingredients also decrease as distance from the application site decreases (MacCollom *et al.*, 1968; Siebers *et al.*, 2003), suggesting that it is unlikely that a person would be repeatedly exposed to elevated airborne concentrations in close succession that would result in a seasonal exposure. If fewer applications were allowed on potatoes and tomatoes, then the potential for seasonal and annual bystander exposures would be extremely remote. STADD estimates address exposures from less than one day up to 7 days.

Swimmer Exposure Estimates

Swimmer exposures to endosulfan in surface waters were estimated based on concentrations of endosulfan reported from surface water sampling and assumptions about uptake of endosulfan from water. No biomonitoring or other exposure monitoring data were available. Exposure estimates were provided for adults for consistency with other scenarios, and for children, as likely worst-case because children have relatively greater surface area exposed to the water, per body weight, than adults.

Endosulfan concentrations used to calculate swimmer exposure estimates were derived from DPR's Surface Water Database. This database contains data reported from a variety of environmental monitoring studies targeting pesticides. These studies were conducted by several agencies, had different detection limits, and different study designs. Sampling frequency and sample collection site varied, and it is possible that the highest endosulfan concentrations were not reflected in the samples collected. If so, then short-term exposures may be underestimated. Some studies monitored irrigation drains, which would be anticipated to have higher concentrations than rivers, for example (although the highest reported concentrations occurred in samples collected from rivers). The collection sites chosen for environmental monitoring might also be biased toward those where pesticides are most likely to occur; if so, the median concentrations used to calculate long-term exposures may be overestimated.

The effectiveness of permit conditions instituted in 1991 by DPR, and incorporated into product labels, has not been assessed. DPR (1994) contains endosulfan data from sampling done between 1990 and 1996. No trend of decreasing endosulfan concentrations since 1991 is evident from these data (the last sample, collected July 22, 1996, had a total endosulfan concentration of 0.122 µg/L).

Swimmer exposures were estimated based on equations and defaults for swimmers in treated swimming pools (U.S. EPA, 2003). The relevance of the assumptions underlying these calculations for swimmers in surface waters, rather than swimming pools, is unknown. No information is available for frequency or duration of swimming in surface waters (as opposed to community or residential swimming pools).

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APPENDICES

Appendix 1 summarizes information used in determining representative reentry scenarios and in estimating reentry worker exposure for crops for which endosulfan use is registered in California.

Appendix 2 summarizes dislodgeable foliar residue (DFR) values used in reentry exposure estimates.

Appendices 3 – 12 provide detailed information on values used in handler exposure estimates. As described in the Exposure Assessment section, the Pesticide Handlers Exposure Database (PHED) combines exposure data from multiple field monitoring studies of different active ingredients (AIs). The user selects a subset of the data having the same or a similar application method and formulation type as the target scenario. Once the PHED subsets were generated, inputs for exposure calculations were entered, according to DPR policy. Exposures were requested in mg per pound of AI handled, because the total work time spent within each handling task is not as well defined. For dermal exposure, both actual and estimated head patches were included. For inhalation exposure, the DPR default inhalation rate for handlers of 16.7 L/min was used. Protective clothing and equipment were chosen based on requirements on product labels and in state and federal laws.

Due to an error in PHED (U.S. EPA, 1998a), values for foot exposures are incorrectly reported, and often omitted entirely. Dermal totals were corrected by addition of the best estimate of feet exposure, calculated by multiplying the value for lower legs by 0.52 (ratio of feet/lower leg surface area; U.S. EPA, 1997).

Appendices 13 and 14 show calculations of exposure for workers dipping nursery stock in endosulfan solutions, based on models made available by U.S. EPA.

Appendix 15 summarizes changes to exposure estimates if mitigation measures proposed by U.S. EPA (2002a) are implemented. This information is provided to assist risk managers in determining whether the measures proposed in U.S. EPA (2002a) would be sufficient to mitigate any exposure concerns in California.

APPENDIX 1: AGRICULTURAL REENTRY SCENARIOS TABLE

This table was prepared by reviewing endosulfan product labels. Maximum application rates and minimum preharvest intervals (PHI) were chosen when they differed between labels; however, application rates and PHI were generally the same on all labels. Under California law, the restricted entry interval for all crops is 2 days.

Rows are sorted by site category (FC = Field Crops; FN = Fruits and Nuts; V = Vegetables; OT = Ornamentals, Herbs, Trees, Nursery/Greenhouse), then by use sites.

In preparing the table, reentry activities were listed for each site, then assigned to tiers based on anticipated exposure. Tier I: Most of the body is in contact with residues. Tier II: Some of the body is in contact with residues (e.g., hands, arms and face; or hands, forearms, feet, and lower legs). Tier III: Very little of the body is in contact with residues (e.g., hands only; or hands and feet only).

Within Tier I and Tier II, suggested representative activities are shown in bold. These are activities that generally should be addressed specifically in an exposure assessment. Tier III activities are considered to be covered by Tier I and Tier II activities. For crops where more than one activity is shown in bold, each activity should be considered in light of pesticide-specific information (i.e., one activity doesn't consistently represent the others). For some pesticides, activities not shown in bold should also be considered.

Site Cat ^a	Use Site	Rate ^b (lb AI/A)	PHI ^c (days)	Tier I Activities (High)	Tier II Activities (Medium)	Tier III Activities (Low)
FC	Alfalfa grown for seed only (SLN 24c)	1	21	None	None	Irrigating ^d , Scouting, Harvesting
FC	Barley, Oats, Rye, Wheat	0.75	None	None	None	Irrigating ^d , Scouting, Harvesting, Swathing
FC	Clover grown for seed only (SLN 24c)	0.5	NA	None	None	Irrigating ^d , Scouting, Harvesting, Weeding
FC	Corn, Sweet	1.5	1	Scouting, Hand Harvesting	None	Irrigating ^d , Weeding, Mech. Harvesting
FC	Cotton	1.5	NA	Scouting	Irrigating ^d , Hand Weeding/Roguing, Harvesting	None
FC	Safflower, Sunflower	1	0	None	Irrigating, Scouting	Weeding, Mech. Harvesting
FC	Tobacco	1	5	Hand Harvesting	Scouting	Irrigating ^d , Harvesting, Pruning, Stripping, Thinning, Topping, Weeding, Reset

Site Cat ^a	Use Site	Rate ^b (lb AI/A)	PHI ^c (days)	Tier I Activities (High)	Tier II Activities (Medium)	Tier III Activities (Low)
FN	Almond, Filbert, Macadamia Nut, Pecan, Walnut	2.5	14	Harvesting (Hand) ^g	Harvesting (Mechanical Shake and Sweep ^f)	Weeding (Mechanical), Irrigating ^d , Scouting, Transplant/Propagate ^e , Pruning (Dormant)
FN	Apple	2.5	21	Thinning	Harvesting (Hand), Pruning (Nondormant), Propping	Scouting, Irrigating ^d , Weeding, Pruning And Tying (Dormant), Transplant/Propagate ^e
FN	Apricots, Nectarines, Peaches	2.5	21	Thinning	Harvesting (Hand), Pruning (Nondormant), Propping	Scouting, Irrigating ^d , Weeding (Mechanical), Pruning (Dormant), Transplant/Propagate ^e
FN	Cherries	2.5	21	Thinning	Harvesting (Hand), Pruning (Nondormant)	Irrigating ^d , Scouting, Weeding, Harvesting (Mechanical), Fertilizing, Transplant/Propagate ^e , Pruning (Dormant)
FN	Citrus (Non- bearing trees and nursery stock)	2.5	NA	Baiting/Trapping (In Tree), Chopping (Brush)	Pruning (Hand)	Irrigating ^d , Weeding, Scouting, Transplant/Propagate ^e , Pruning (Mechanical)
FN	Grapes	1.5	7	Leaf Pulling/Cane Turning , Cane Cutting, Thinning	Harvest (Hand), Scouting, Pruning (Nondormant)	Weeding (Hand), Girdling, Pruning, Training/Tying/ Trellising, Transplant/Propagate ^e
FN	Pears	2.5	7	Harvest (Hand), Thinning	Pruning (Nondormant)	Scouting, Irrigating ^d , Weeding (Hand, Mechanical), Propping, Pruning And Tying (Dormant), Transplant/Propagate ^e
FN	Pineapple (Fresh Market)	2	7	Harvest (Hand)	Scouting	Harvest (Mechanical), Irrigating ^d , Weeding (Hand), Transplant/Propagate ^e
FN	Plums, Prunes	2.5	7	Thinning	Harvest (Hand), Pruning (Nondormant)	Irrigating ^d , Scouting, Pruning (Dormant), Weeding (Mechanical), Transplant/Propagate ^e
FN	Strawberry	2	4	None	Harvest (Hand), Pruning/Pinching	Scouting, Irrigating ^d , Weeding/Runner Cut, Mulching, Training, Transplant/Propagate ^e
OT	Cherry, Peach, Plum (Nursery Stock Dip)	2 lbs per 40 gallons	NA	None	None	Packing of Treated Plants, Planting by Hand
OT	Ornamentals, Greenhouse and Out-Of-Doors	1 lb per 100 gal drench	NA	None	Hand Harvesting Cut Flowers	Scouting, Irrigating ^d , Pruning, Thinning, Weeding, Transplanting

Site Cat ^a	Use Site	Rate ^b (lb AI/A)	PHI ^c (days)	Tier I Activities (High)	Tier II Activities (Medium)	Tier III Activities (Low)
OT	Ornamental Trees and Shrubs	1 lb per 100 gal drench	NA	None	None	Scouting, Harvesting, Chopping Brush, Irrigating ^d , Pruning, Thinning, Weeding, Transplanting
V	Beans, Succulent and Dry	1	3	Tying, Staking, Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Transplanting ^e , Harvesting (Mechanical)
V	Broccoli, Cabbage,	1	7	Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Thinning, Transplanting ^e , Harvesting (Mechanical)
V	Brussels Sprouts, Cauliflower	1	14	Irrigating, Topping, Harvesting (Hand)	Scouting	Weeding, Thinning, Transplanting ^e , Harvesting (Mechanical)
V	Carrots	1	7	None	Harvesting (Hand)	Scouting, Irrigating, Weeding, Harvesting (Mechanical)
V	Celery	1	4	Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Transplanting ^e
V	Collards	0.75	21	Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Thinning, Transplanting ^e
V	Crucifers for seed only (Broccoli, Cabbage, Collards, Chinese Cabbage, Kale, Mustard, Kohlrabi, Rape, Rutabaga, Turnips)	2	NA	None	Harvest , Pruning, Training, Weeding (Hand)	Scouting, Irrigating, Weeding, Transplanting
V	Cucumbers, Melons, Pumpkins, Summer and Winter Squash	1	2	Tying, Staking, Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Thinning, Transplanting ^e , Harvesting (Mechanical)
V	Eggplant	1	1	Pruning (Hand) ^g , Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Transplanting ^e
V	Kale	0.75	21	None	Irrigating ^d , Scouting, Harvesting (Hand)	Weeding, Thinning, Transplanting ^e
V	Lettuce	1	14	Head Breaking (For Head), Harvesting (Hand)	Irrigating ^d , Scouting	Thinning, Weeding, Transplanting ^e

Site Cat ^a	Use Site	Rate ^b (lb AI/A)	PHI ^c (days)	Tier I Activities (High)	Tier II Activities (Medium)	Tier III Activities (Low)
V	Mustard Greens	0.75	21	Harvesting (Hand)	Irrigating ^d , Scouting	Thinning, Weeding, Transplanting ^e , Harvesting (Mechanical)
V	Peas, Succulent	1	0	Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Harvesting (Mechanical)
V	Peppers	1 (or 0.5)	4 (or 1)	Thinning, Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Transplanting ^e
V	Potato (White, Irish, Red, Russet)	1	1	None	Irrigating ^d , Scouting , Harvesting (Hand) ^e	Weeding, Transplanting ^e , Harvesting (Mechanical)
V	Spinach	0.75	21	None	Irrigating ^d , Scouting, Harvesting (Hand)	Thinning, Weeding, Transplanting ^e , Harvesting (Mechanical)
V	Sugar Beets	1	30	Harvesting (Hand) ^g	Irrigating ^d , Scouting	Weeding, Thinning, Harvesting (Mechanical)
V	Sweet Potato	1	1	None	Irrigating ^d , Scouting , Harvesting (Hand) ^g	Weeding, Transplanting ^e , Harvesting (Mechanical)
V	Tomato (Fresh Market)	1	2	Tying, Training, Staking, Pruning (Hand) ^d , Harvesting (Hand)	Irrigating ^d , Scouting	Weeding, Thinning, Transplanting ^e
V	Tomato (Processing/ Canning)	1	2	Tying, Training, Staking	Irrigating ^d , Scouting , Pruning (Hand) ^a	Weeding, Transplanting ^e , Harvesting (Mechanical)

^a Site categories: FC = Field Crops; FN = Fruits and Nuts; M = Miscellaneous; OT = Ornamentals, Herbs, Trees, Nursery/Greenhouse; V = Vegetables.

^b Rate = Maximum application rate listed for crop in California on any product label.

^c PHI = Minimum preharvest interval listed for crop in California on any product label.

^d Irrigator exposure is dependent upon the method of irrigation used for the crop, where drip irrigation is Tier III (low), flood or furrow irrigation of crops less than 18 inches high is Tier III (low), flood or furrow irrigation of crops 18 inches or taller is Tier II (moderate), sprinkler irrigation of crops less than 18 inches high is Tier II (moderate), and sprinkler irrigation of crops 18 inches or taller is Tier I (high).

^e Transplant/propagate activity has little potential for exposure in the field, but may present a potential for exposure during the propagation stage in the nursery or greenhouse setting. Refer to greenhouse/nursery scenarios.

^f Mechanical harvesting by shaking and sweeping to drop and collect fruits/nuts, respectively, may generate dust and debris (falling leaves, branches, produce) sufficient to expose harvester to pesticide residues by dermal contact with or inhalation of debris/dust. However, no residue transfer data are available for this scenario at present.

^g This activity isn't practiced commercially in California at present.

APPENDIX 2: DISLODGEABLE FOLIAR RESIDUES FOR ENDOSULFAN

Table 2-1. Measured DFR for Endosulfan Applied to Melons, Peaches, or Grapes

Day	Measured DFR ($\mu\text{g}/\text{cm}^2$) ^a					
	Melons		Peaches		Grapes	
	EC ^b	WP ^b	EC	WP	EC	WP
0	1.23	1.00	0.46	1.02	0.71	1.32
1	0.54	1.14	0.16	0.55	0.31	1.36
3	0.15	0.53	0.09	0.43	0.11	0.51
5	0.09	0.32	0.07	0.30	0.09	0.74
7	0.06	0.18	0.04	0.22	0.03	0.28
10	0.05	0.12	0.03	0.16	0.02	0.20
14	0.05	0.07	0.03	0.11	0.04	0.24
17	0.03	0.04	0.03	0.10	0.05	0.30
21	0.02	0.02	0.05	0.09	0.02	0.20
24	0.02	0.04	0.02	0.07	0.04	0.19
28	0.02	0.03	0.01	0.04	< LOQ ^c	0.13

^a Dislodgeable foliar residue (DFR) data from Table 1 in Whitmyre *et al.* (2004). Applications and sample collection in July through September 1995 in Fresno County (Singer, 1997). Results include combined residues from α -endosulfan, β -endosulfan and endosulfan sulfate. Applications: melons, 2 at 1 lb AI/acre; grapes, 2 at 1.5 lb AI/acre; peaches, one at 3 lbs AI/acre. Laboratory fortifications had overall recovery means \pm SD of $80 \pm 5\%$, $85 \pm 4\%$, and $91 \pm 3\%$ for α -endosulfan, β -endosulfan, and endosulfan sulfate, respectively (Singer, 1997). No field fortifications were reported.

^b EC: emulsifiable concentrate. WP: wettable powder.

^c Limit of Quantification (LOQ): $0.01 \mu\text{g}/\text{cm}^2$.

Table 2-2. Predicted DFR for Endosulfan Applied to Melons, Peaches, or Grapes

Day	Predicted DFR ($\mu\text{g}/\text{cm}^2$) ^a					
	Melons		Peaches		Grapes	
	EC ^b	WP ^b	EC	WP	EC	WP
0	0.40	1.4	0.11	0.48	0.17	1.1
1	0.31	1.1	0.10	0.44	0.15	0.95
2	0.25	0.78	0.095	0.41	0.14	0.83
3	0.20	0.58	0.089	0.37	0.13	0.73
4	0.16	0.44	0.083	0.34	0.12	0.64
5	0.13	0.34	0.077	0.31	0.11	0.57
6	0.11	0.27	0.072	0.29	0.10	0.51
7	0.092	0.21	0.067	0.26	0.091	0.45
10	0.056	0.11	0.054	0.20	0.070	0.34
14	0.034	0.058	0.041	0.14	0.048	0.24
17	0.026	0.041	0.033	0.11	0.036	0.21
21	0.022	0.031	0.024	0.077	0.024	0.18
24	0.021	0.029	0.019	0.059	0.018	0.17

^a Dislodgeable foliar residue (DFR) data from Whitmyre *et al.* (2004). Regression equations yielding predicted DFR shown in Table 8. Unbiased predicted values obtained by backtransformation using SAS Proc REG (SAS, 2003).

^b EC: emulsifiable concentrate. WP: wettable powder.

Table 2-3. Measured and Predicted DFR for Endosulfan Applied to Tomato, Celery, or Bok Choy

Day	Measured DFR ($\mu\text{g}/\text{cm}^2$) ^a					
	Tomato		Celery		Bok Choy	
	Measured	Predicted ^b	Measured	Predicted ^b	Measured	Predicted ^b
0	0.2408	0.135	0.1123	0.151	0.195	0.253
1	0.0743	0.0770	0.0322	0.123	0.122	0.166
1.5	ND ^c	ND	0.1008	ND	ND	ND
2	ND	0.0456	0.227	0.0996	0.124	0.108
3	0.0307	0.0282	ND	0.0800	0.095	0.0701
4	ND	0.0183	ND	0.0638	ND	0.0454
5	0.0117	0.0124	ND	0.0506	ND	0.0294
6	ND	0.0087	ND	0.0398	ND	0.0189
7	ND	0.0065	0.0193	0.0311	0.006	0.0122
10	ND	0.0034	ND	0.0142	ND	0.0032
13	0.0027	0.0027	0.0056	0.0061	0.0016	0.0008

^a Dislodgeable foliar residue (DFR) data from Table 1 in Maddy *et al.* (1985). All applications were 1.0 lb AI/acre, emulsifiable concentrate formulation. Results include combined residues from α -endosulfan, β -endosulfan and endosulfan sulfate.

^b Regression equations yielding predicted DFR shown in Table 8. Unbiased predicted values obtained by backtransformation using SAS Proc REG (SAS, 2003).

^c ND = Not determined.

APPENDIX 3: SUBSET FROM PHED FOR MIXER/LOADERS OF LIQUID FORMULATIONS

Table 3-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Parameter	Specifications used to generate subsets ^a	Actual characteristics of resulting subsets
Data Quality Grades ^b	A,B	A
Liquid Type	Emulsifiable concentrate, aqueous suspension, microencapsulated, solution, or undiluted liquid	All emulsifiable concentrate
Mixing Procedure	Closed, mechanical pump or gravity feed	Closed

^a Subsets of Mixer/Loader data in the Pesticide Handlers Exposure Database (PHED). Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Airborne, Dermal Uncovered, Dermal Covered and Hand are all Grade A. Data quality grades are defined in the text and in Versar (1992).

Figure 3-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES
SCENARIO: Long pants, long sleeves, gloves

PATCH LOCATION	Mean	Coef of Var	Geo. Mean	Obs.
HEAD <ALL>	1.6959	121.3279	.9508	22
NECK FRONT	1.5225	278.5222	.2418	22
NECK BACK	.456	280.8991	.0729	22
UPPER ARMS	1.3441	96.6967	.7988	21
CHEST	1.8416	93.4405	1.0577	16
BACK	1.8416	93.4405	1.0577	16
FOREARMS	.5474	98.5203	.3206	21
THIGHS	2.3398	81.9301	1.5773	16
LOWER LEGS	1.292	85.7276	.8778	21

Subset Name:
S6DERMAL.MLOD

^a Subset criteria included actual and estimated head patches. Of the 22 head observations, all were actual.

Table 3-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	13.6	21 ^d	4	1
Hand (with gloves)	5.72	31	4	1
Inhalation	0.128	27	4	1

^a Results from subsets of Mixer/Loader data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (US EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 3-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	4(3.52 + 5.72) = 37.0 µg/lb AI handled	1(3.52 + 5.72) = 9.52 µg/lb AI handled
Inhalation	4(0.128) = 0.512 µg/lb AI handled	1(0.128) = 0.128 µg/lb AI handled

^a Values from Table 3-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet; chemical-resistant apron assumed to provide 95% protection (Thongsinthusak *et al*, 1991) to chest and front half of thighs.

APPENDIX 4: SUBSET FROM PHED FOR MIXER/LOADERS, WETTABLE POWDERS

Table 4-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Parameter	Specifications used to generate subsets ^a	Actual characteristics of resulting subsets
Data Quality Grades ^b	A,B	A,B
Solid Type	Wettable powder	Wettable powder
Mixing Procedure	Open	Open

^a Subsets of Mixer/Loader data in the Pesticide Handlers Exposure Database (PHED). Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Dermal Uncovered, Dermal Covered and Hand are all Grade A or B; Airborne data are all Grade A. Data quality grades are defined in the text and in Versar (1992).

Figure 4-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES					
SCENARIO: Long pants, long sleeves, gloves					
PATCH LOCATION	MICROGRAMS PER LB AI MIXED Mean	Coef of Var	Geo. Mean	Obs.	Subset Name: S1DERMAL.MLOD
HEAD (ALL)	12.1008	159.063	3.243	24	
NECK.FRONT	49.7781	241.7376	1.6288	24	
NECK.BACK	35.299	250.8502	.9205	24	
UPPER ARMS	181.099	412.7976	15.4083	30	
CHEST	155.2533	458.3228	9.6478	36	
BACK	165.361	437.2647	9.8479	36	
FOREARMS	12.2599	180.986	4.6336	28	
THIGHS	5.7027	140.9473	2.8042	28	
LOWER LEGS	4.046	120.7341	1.9477	28	

^a Subset criteria included actual and estimated head patches. Of the 24 head observations, all were actual.

Table 4-2. PHED data from dermal, hand, and inhalation subsets for Scenario 1 ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	623	28 ^d	4	1
Hand (with gloves)	23.7	20	4	1
Inhalation	49.4	17	5	1

^a Results from subsets of Mixer/Loader data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 4-3. Values Used in Scenario 1 Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	4(74.3) + 4(23.7) = 392 µg/lb AI handled	1(74.3) + 1(23.7) = 98.0 µg/lb AI handled
Inhalation ^c	5(4.94) = 24.7 µg/lb AI handled	1(4.94) = 4.94 µg/lb AI handled

^a Values from Table 4-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet; chemical-resistant apron assumed to provide 95% protection (Thongsinthusak *et al*, 1991) to chest and front half of thighs.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 5: SUBSET FROM PHED FOR MIXER/LOADERS OF WETTABLE POWDER FORMULATIONS IN WATER SOLUBLE PACKAGING

Table 5-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Parameter	Specifications used to generate subsets ^a	Actual characteristics of resulting subsets
Data Quality Grades ^b	A,B	A,B
Solid Type	Wettable powder	Wettable Powder
Package Type	Water Soluble Bag	Water Soluble Bag

^a Subsets of Mixer/Loader data in the Pesticide Handlers Exposure Database (PHED). Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Dermal Uncovered, Dermal Covered and Hand are all Grade A or B; Airborne data are all Grade A. Data quality grades are defined in the text and in Versar (1992).

Figure 5-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES					
SCENARIO: Long pants, long sleeves, gloves					
PATCH LOCATION	MICROGRAMS PER LB AI MIXED Mean	Coef of Var	Geo. Mean	Obs.	Subset Name: S3DERMAL.MLOD
HEAD (ALL)	3.51	165.0541	1.1942	15	
NECK.FRONT	.423	155.9811	.1734	15	
NECK.BACK	.2933	167.61	.0978	15	
UPPER ARMS	2.619	17.2127	2.5837	6	
CHEST	1.8046	83.2317	1.1207	12	
BACK	1.8046	83.2317	1.1207	12	
FOREARMS	1.089	17.2176	1.0743	6	
THIGHS	4.9023	204.1674	1.6636	12	
LOWER LEGS	1.19	86.1261	.7092	12	

^a Subset criteria included actual and estimated head patches. Of the 15 head observations, all were actual.

Table 5-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	18.3	12 ^d	5	2
Hand (with gloves)	0.056	6	9	2
Inhalation	0.277	12	5	2

^a Results from subsets of Mixer/Loader data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 5-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	5(5.57) + 9(0.056) = 28.4 µg/lb AI handled	2(5.57) + 2(0.056) = 11.3 µg/lb AI handled
Inhalation	5(0.277) = 1.38 µg/lb AI handled	2(0.277) = 0.554 µg/lb AI handled

^a Values from Table 5-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet; chemical-resistant apron assumed to provide 95% protection (Thongsinthusak *et al*, 1991) to chest and front half of thighs.

APPENDIX 6: SUBSET FROM PHED FOR AERIAL APPLICATORS

Table 6-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Parameter	Specifications used to generate subsets ^a	Characteristics of resulting subsets
Data Quality Grades ^b	A,B,C	A,B,C
Liquid Type	Not specified	All emulsifiable concentrate
Solid Type	Exclude granular	none
Application Method	Fixed- or rotary-wing	All fixed-wing
Cab Type	Open Cab or Closed Cab with Open Window	Open Cab or Closed Cab with Open Window

^a Subsets of Applicator data in the Pesticide Handlers Exposure Database (PHED). Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Dermal Uncovered, Dermal Covered, and Hand were Grade A or C; Airborne data were Grade B or C. Data quality grades are defined in the text and in Versar (1992).

Figure 6-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES
SCENARIO: Long pants, long sleeves, gloves

PATCH LOCATION	MICROGRAMS Mean	PER LB AI Coef of Var	SPRAYED Geo. Mean	Obs.	
HEAD <ALL>	4.212	118.2574	1.2438	10	Subset Name: S17DERMAL.APPL
NECK.FRONT	.414	143.6715	.1169	10	
NECK.BACK	.3124	139.1485	.0741	10	
UPPER ARMS	8.5554	109.6232	5.7532	10	
CHEST	6.3065	158.1987	2.1395	17	
BACK	8.7497	141.5614	3.131	17	
FOREARMS	2.7901	131.7516	1.1744	17	
THIGHS	9.55	157.4126	3.4718	13	
LOWER LEGS	7.4494	138.0769	3.3312	10	

^a Subset criteria included actual and estimated head patches. Of the 10 head observations, 7 were actual and 3 were estimated from nearby patches (Versar, 1992).

Table 6-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	52.2	10 ^d	6	2
Hand (with gloves)	9.63	9	6	2
Inhalation	0.573	14	5	2

^a Results from subsets of Applicator data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 6-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	6(12.5) + 6(9.63) = 133 µg/lb AI handled	2(12.5) + 2(9.63) = 44.3 µg/lb AI handled
Inhalation ^c	5(0.0573) = 0.286 µg/lb AI handled	2(0.0573) = 0.115 µg/lb AI handled

^a Values from Table 6-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 7: SUBSET FROM PHED FOR FLAGGERS

Table 7-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Parameter	Specifications used to generate subsets ^a	Characteristics of resulting subsets
Data Quality Grades ^b	A,B	A,B
Liquid Type or Solid Type	Not specified	Emulsifiable concentrate or dry flowable
Application Method	Fixed- or rotary-wing	All rotary-wing

^a Subsets of Flagger data in the Pesticide Handlers Exposure Database (PHED). Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Dermal Uncovered and Dermal Covered are all Grade A; Airborne and Hand data are all Grade A or B. Data quality grades are defined in the text and in Versar (1992).

Figure 7-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES
SCENARIO: Long pants, long sleeves, gloves

PATCH LOCATION	MICROGRAMS Mean	PER LB AI Coef of Var	SPRAYED Geo. Mean	Obs.
HEAD <ALL>	11.3028	127.5702	5.6188	18
NECK.FRONT	.9533	134.3334	.5146	18
NECK.BACK	1.4111	215.8529	.4931	18
UPPER ARMS	3.9285	195.1025	.8284	28
CHEST	5.1065	188.8378	1.0384	26
BACK	5.1065	188.8378	1.0384	26
FOREARMS	1.802	179.5283	.3837	28
THIGHS	4.0404	308.6996	.9165	26
LOWER LEGS	2.448	305.6618	.612	28

Subset Name:
S7DERMAL.FLAG

^a Subset criteria included actual and estimated head patches. Of the 18 head observations, all were actual.

Table 7-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand)	37.4	26 ^d	4	1
Hand (no gloves)	5.97	30	4	1
Inhalation	0.200	28	4	1

^a Results from subsets of Flagger data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 7-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (with PPE) ^b	4(15.1 + 0.597) = 62.8 µg/lb AI handled	1(15.1 + 0.597) = 16.0 µg/lb AI handled
Inhalation ^c	4(0.020) = 0.080 µg/lb AI handled	1(0.020) = 0.020 µg/lb AI handled

^a Values from Table 7-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): gloves assumed to provide 90% protection (Aprea *et al*, 1994); exposure of gloved hands is calculated as one tenth exposure of bare hands. Coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 8: SUBSET FROM PHED FOR GROUNDBOOM APPLICATORS

Table 8-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Parameter	Specifications used to generate subsets ^a	Actual characteristics of resulting subsets
Data Quality Grades ^b	A,B	A,B,C
Liquid Type or Solid Type	Not specified	Emulsifiable concentrate or wettable powder
Application Method	Groundboom, Truck or Tractor	Groundboom, Tractor
Cab Type	Open Cab or Closed Cab with Open Window	Open Cab or Closed Cab with Open Window

^a Subsets of Applicator data in the Pesticide Handlers Exposure Database (PHED). Parameter descriptions are from screens displayed in the PHED program.

^b Data quality grades for Airborne, Dermal Uncovered, Dermal Covered and Hand are all Grade A or B, with the exception of one dermal replicate that has Dermal Uncovered Grade C (Dermal Covered for that replicate is Grade B). Data quality grades are defined in the text and in Versar (1992).

Figure 8-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES				
SCENARIO: Long pants, long sleeves, no gloves				
PATCH LOCATION	MICROGRAMS PER LB AI SPRAYED Mean	Coef of Var	Geo. Mean	Obs.
HEAD <ALL>	2.7891	136.1192	1.0464	33
NECK.FRONT	1.5763	167.9503	.3296	23
NECK.BACK	1.0063	173.5765	.2335	29
UPPER ARMS	1.6914	88.749	1.1637	32
CHEST	1.7581	98.5154	1.1329	42
BACK	3.0175	233.2361	1.3959	42
FOREARMS	2.7301	419.1055	.564	32
THIGHS	3.1255	185.5703	1.1806	33
LOWER LEGS	2.1148	172.3425	.7466	35

Subset Name: S11DERMAL.APPL

^a Subset criteria included actual and estimated head patches. Of the 33 head observations, all were actual.

Table 8-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	20.9	33 ^d	4	1
Hand (no gloves)	45.6	29	4	1
Inhalation	1.18	22	4	1

^a Results from subsets of Applicator data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 8-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	4(5.58 + 4.56) = 40.6 µg/lb AI handled	1(5.58 + 4.56) = 6.04 µg/lb AI handled
Inhalation ^c	4(0.118) = 0.472 µg/lb AI handled	1(0.118) = 0.118 µg/lb AI handled

^a Values from Table 8-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): gloves assumed to provide 90% protection (Aprea *et al*, 1994); coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 9: SUBSET FROM PHED FOR MIXER/LOADER/APPLICATORS USING BACKPACK SPRAYERS

Table 9-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Parameter	Specifications used to generate subsets ^a	Actual characteristics of resulting subsets
Data Quality Grades ^b	A,B,C	A,B,C
Liquid Type	Not specified	Solution, Microencapsulated
Application Method	Backpack	Backpack
Mixing Procedure	Open	Open

^a Subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED).

Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Airborne, Dermal Uncovered, Dermal Covered are all Grade A or B; Hand data are all Grade C. Data quality grades are defined in the text and in Versar (1992).

Figure 9-1. Summary of results from the PHED subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES				
SCENARIO: Long pants, long sleeves, gloves				
PATCH LOCATION	MICROGRAMS Mean	PER AVERAGE Coef of Var	LB AI Geo. Mean	Obs.
HEAD <ALL>	345.2564	194.899	91.4483	11
NECK FRONT	178.6391	155.1078	38.2719	11
NECK BACK	1163.209	108.1731	611.9794	11
UPPER ARMS	10116.4827	239.4633	257.2654	11
CHEST	275.4477	170.903	65.7564	11
BACK	8918.1809	167.9854	1044.0635	11
FOREARMS	153.593	184.2219	30.0425	11
THIGHS	597.2782	282.8189	49.147	9
LOWER LEGS	425.8878	230.6324	64.6874	9

Subset Name:

S20DERMAL.MLAP

^a Subset criteria included actual and estimated head patches. Of the 11 head observations, all were actual.

Table 9-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	22,300	11 ^d	6	2
Hand (with gloves)	9.68	11	6	2
Inhalation	17.5	11	6	2

^a Results from subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 9-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	6(2,650 + 9.68) = 16,000 µg/lb AI handled	2(2,650 + 9.68) = 5,320 µg/lb AI handled
Inhalation ^c	6(1.75) = 10.5 µg/lb AI handled	2(1.75) = 3.50 µg/lb AI handled

^a Values from Table 9-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 10: SUBSET FROM PHED FOR MIXER/LOADER/APPLICATORS USING HIGH PRESSURE HANDWAND SPRAYERS

Table 10-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Actual characteristics of resulting

Parameter	Specifications used to generate subsets ^a	subsets
Data Quality Grades ^b	A,B,C	A,C
Liquid Type	Not specified	Microencapsulated
Application Method	High pressure hand wand	High Pressure Handwand, Greenhouse/Ornamental
Mixing Procedure	Open	All open

^a Subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED).

Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Airborne, Dermal Uncovered, Dermal Covered are all Grade A; Hand data are all Grade C. Data quality grades are defined in the text and in Versar (1992).

Figure 10-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES				
SCENARIO: Long pants, long sleeves, gloves				
PATCH LOCATION	MICROGRAMS Mean	PER Coef of Var	AVERAGE LB AI Geo. Mean	Obs.
HEAD <ALL>	335.34	189.3598	108.1326	13
NECK FRONT	684.7243	169.8879	240.7374	7
NECK BACK	502.1311	169.8879	176.5408	7
UPPER ARMS	1000.3013	153.8867	353.808	13
CHEST	1220.2988	153.8867	431.6215	13
BACK	1220.2988	153.8867	431.6215	13
FOREARMS	415.9328	153.8867	147.1161	13
THIGHS	614.7471	125.9135	325.0308	7
LOWER LEGS	383.01	125.9135	202.5061	7

Subset Name:

S21DERMAL.MLAP

^a Subset criteria included actual and estimated head patches. Of the 80 head observations, 10 were actual and 70 were estimated from nearby patches (Versar, 1992).

Table 10-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	6,580	13 ^d	5	2
Hand (with gloves)	339	13	5	2
Inhalation	151	13	5	2

^a Results from subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 10-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	5(1,140 + 339) = 7,400 µg/lb AI handled	2(1,140 + 339) = 2,960 µg/lb AI handled
Inhalation ^c	5(15.1) = 75.5 µg/lb AI handled	2(15.1) = 30.2 µg/lb AI handled

^a Values from Table 10-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 11: SUBSET FROM PHED FOR MIXER/LOADER/APPLICATORS USING LOW PRESSURE HANDWAND SPRAYER WITH LIQUID FORMULATIONS

Table 11-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Actual characteristics of

Parameter	Specifications used to generate subsets ^a	resulting subsets
Data Quality Grades ^b		
Airborne	A,B	A, B
Dermal and Hand	A, B, C	A, B, C
Liquid Type	Emulsifiable concentrate, aqueous suspension, microencapsulated, solution, or undiluted liquid	Solution or Microencapsulated
Application Method	Low Pressure Handwand	Low Pressure Handwand
Mixing Procedure	Not specified	All open

^a Subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED).

Parameter descriptions are from screens displayed in the PHED program.

^b Data quality grades are defined in the text and in Versar (1992).

Figure 11-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES				
SCENARIO: Long pants, long sleeves, gloves				
PATCH LOCATION	MICROGRAMS Mean	PER AVERAGE Coef of Var	LB AI Geo. Mean	Obs.
HEAD <ALL>	658.5361	136.7049	290.5017	80
NECK FRONT	137.9226	369.6483	18.9272	80
NECK BACK	86.3274	429.9868	14.8349	79
UPPER ARMS	111.8313	232.934	32.6211	10
CHEST	235.1875	185.929	48.9756	10
BACK	163.797	202.4421	41.5723	10
FOREARMS	40.9585	267.6492	9.412	10
THIGHS	37.9878	115.1859	27.6737	9
LOWER LEGS	66.9309	164.3135	30.0241	9

Subset Name:

S22DERMAL.MLAP

^a Subset criteria included actual and estimated head patches. Of the 80 head observations, 10 were actual and 70 were estimated from nearby patches (Versar, 1992).

Table 11-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	1,570	10 ^d	6	2
Hand (with gloves)	10.4	10	6	2
Inhalation	22.8	10	6	2

^a Results from subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 11-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	6(777 + 10.4) = 4,720 µg/lb AI handled	2(777 + 10.4) = 1,570 µg/lb AI handled
Inhalation ^c	6(2.28) = 13.7 µg/lb AI handled	2(2.28) = 4.56 µg/lb AI handled

^a Values from Table 11-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 12: SUBSET FROM PHED FOR MIXER/LOADER/APPLICATORS USING LOW PRESSURE HANDWAND WITH WETTABLE POWDER FORMULATIONS

Table 12-1. Description of Pesticide Handlers Exposure Database (PHED) subsets ^a

Actual characteristics of resulting

Parameter	Specifications used to generate subsets ^a	subsets
Data Quality Grades ^b	A,B,C	A,C
Solid Type	Wettable powder	Wettable powder
Application Method	Low Pressure Handwand	Low Pressure Handwand
Mixing Procedure	Not specified	All open

^a Subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED).

Parameter descriptions are from screens displayed in the PHED program.

^b Data quality for Airborne, Dermal Uncovered, Dermal Covered are all Grade C; Hand data are all Grade A. Data quality grades are defined in the text and in Versar (1992).

Figure 12-1. Summary of results from the PHED dermal subset ^a

SUMMARY STATISTICS FOR CALCULATED DERMAL EXPOSURES					Subset Name:
SCENARIO: Long pants, long sleeves, gloves					
PATCH LOCATION	MICROGRAMS Mean	PER AVERAGE Coef of Var	LB AI Geo. Mean	Obs.	S23DERMAL.MLAP
HEAD <ALL>	2636.0019	179.0708	1267.5067	16	
NECK.FRONT	756.6675	296.038	176.9167	16	
NECK.BACK	151.0809	73.0526	109.8324	16	
UPPER ARMS	494.7182	36.3833	463.0868	16	
CHEST	700.3928	71.0002	603.0781	16	
BACK	611.7981	38.4089	569.1622	16	
FOREARMS	448.2142	146.8857	287.9792	16	
THIGHS	5126.2967	165.785	2440.9362	16	
LOWER LEGS	458.983	52.9223	410.828	16	

^a Subset criteria included actual and estimated head patches. Of the 16 head observations, all were actual.

Table 12-2. PHED data from dermal, hand, and inhalation subsets ^a

Exposure Category	Exposure (µg/lb AI handled)	Replicates in subset	Short-Term Multiplier ^b	Long-Term Multiplier ^b
Dermal (non-hand) ^c	11,600	16 ^d	5	1
Hand (with gloves)	3,430	15	5	1
Inhalation	1,040	16	5	1

^a Results from subsets of Mixer/Loader/Applicator data in the Pesticide Handlers Exposure Database (PHED). Results rounded to three significant figures.

^b Multipliers are explained in the text and in Powell (2002).

^c Dermal total includes addition of default feet value of 0.52 x (value for lower legs); ratio of feet/lower leg surface area (U.S. EPA, 1997).

^d Median number of replicates was used in determining subset multipliers.

Table 12-3. Values Used in Exposure Calculations ^a

	Short-Term Exposure	Long-Term Exposure
Total Dermal (all PPE) ^b	5(3,730 + 3,430) = 35,800 µg/lb AI handled	1(3,730 + 3,430) = 7,160 µg/lb AI handled
Inhalation ^c	5(104) = 520 µg/lb AI handled	1(104) = 104 µg/lb AI handled

^a Values from Table 12-2. Results rounded to three significant figures.

^b Estimates adjusted for personal protective equipment (PPE): coveralls assumed to provide 90% protection (Thongsinthusak *et al*, 1991) to all but head, hands, and feet.

^c 90% protection factor applied to inhalation exposure for use of respirator (NIOSH, 1987).

APPENDIX 13: CALCULATION OF PARAMETERS USED IN ESTIMATING DERMAL EXPOSURE TO WORKERS DIPPING NURSERY STOCK

1. K_p is the skin permeability coefficient, calculated as follows (U.S. EPA, 2004a):

$$\log K_p = -2.80 + 0.66 \log K_{ow} - 0.0056 MW$$

With MW of 406.96 and Log K_{ow} of 4.74, the K_p is 0.0112 cm/hr for endosulfan.

2. B is the dimensionless ratio of two permeability coefficients, one for the stratum corneum (SC) and one for the epidermis (EPI). However, as explained by Bunge and Cleek (1995), the permeability coefficient for the epidermis is exceedingly difficult to determine: "Although experimental protocols exist for removing the EPI leaving an intact SC, techniques for removing the SC without damaging the EPI do not exist." Because the permeability of the epidermis is almost never known, Bunge and Cleek (1995) proposed four methods of estimating B without knowing the epidermal permeability, based on empirical data and theory. B is estimated from Equation A.1 in U.S. EPA (2004a). Equation A.1 is based on Method 4 in Bunge and Cleek (1995):

$$B = K_p[(MW)^{0.5}/(2.6 \text{ cm/hr})]$$

where K_p is the estimated steady-state dermal permeability coefficient in water, calculated as above.

For endosulfan,

$$B = (0.0112)[(406.96)^{0.5}/(2.6)] = 0.0870.$$

3. τ is the lag time per event (hours). The lag time is how long it takes for a chemical to cross the skin, including both the SC and EPI (Bunge *et al.*, 1995). τ is calculated as follows (U.S. EPA, 2004a):

$$\tau = 0.105 \times 10^{(0.0056 MW)}$$

For endosulfan, MW = 406.96. Thus,

$$\tau = 0.105 \times 10^{(0.0056 * 406.96)} = 0.105 \times 10^{(2.279)} = 0.105 (190) = 19.9 \text{ hours}$$

4. The equation for dermal exposure per event DA_{event} in RAGS-E is as follows (modified from Equation 3.3 in U.S. EPA (2004a), surface area term added to get result in mg/event rather than mg/cm²):

$$DA_{\text{event}} = FA * K_p * SA * C_w * (0.001\text{L}/\text{cm}^3) * [t/(1+B) + 2\tau((1+3B+3B^2)/(1+B)^2)]$$

Appendix 13, Continued...

where

DA_{event} is the absorbed dose per event (mg per event);

FA is the fraction absorbed water (dimensionless, default = 1);

SA (cm²) is surface area of exposed skin;

C_w is the concentration of the pesticide in water (multiply by the appropriate protection factor);

t is the event duration (hours); and

other parameters are as defined above.

5. Absorbed daily dose is calculated by dividing the DA_{event} by the body weight (BW).

Results of above calculations are summarized in Table 13-1.

Table 13-1. Dermal Endosulfan Exposures Estimated with Equations from RAGS-E^a

Parameter	Value
K _p (cm/hr) ^b	0.0112
τ (hours) ^c	19.9
B ^d	0.0870
<u>Hands</u>	
DA _{event} (mg per day) ^e	319
ADD (mg/kg/day) ^f	4.56
<u>Non-Hand Dermal</u>	
DA _{event} (mg per day) ^g	2,580
Dermal ADD (mg/kg/day) ^h	36.87
<u>Total Dermal</u>	
Total Dermal ADD (mg/kg/day) ⁱ	41.4
^a C _w = 6,000 mg/L for endosulfan (concentration in solution prepared according to directions on Thiodan [®] 3EC product label). C _w multiplied by 0.1 for gloves and coveralls over one layer of clothing, default protection factor of 90% (Thongsinthusak <i>et al.</i> , 1991; Aprea <i>et al.</i> , 1994).	
^b Skin permeability coefficient (K _p) calculated from Equation 3.8 in U.S. EPA (2004a).	
^c Lag time to reach steady-state (τ) calculated from Equation A.4 in U.S. EPA (2004a). The lag time is how long it takes for a chemical to cross all skin layers (Bunge <i>et al.</i> , 1995).	
^d Calculated from Equation A.1 in U.S. EPA (2004a), based on Method 4 in Bunge and Cleek (1995).	
^e Estimated hand exposure per day. Calculated from Equation 3.3 in U.S. EPA (2004a), SA = 904 cm ² (surface area both hands; combined male and female medians from EPA, 1997). ET = 8 hours.	
^f ADD is absorbed daily dose. DA _{event} divided by 70 kg default body weight to obtain dermal dose (Thongsinthusak <i>et al.</i> , 1993).	
^g Estimated dermal exposure per day. Calculated from Equation 3.3 in U.S. EPA (2004a), SA = 7,306 cm ² (surface area of chest/stomach, forearms, front of thighs and lower legs; combined male and female medians from EPA, 1997). ET = 8 hours.	
^h Dermal ADD is absorbed daily dose. AD _{Derm} divided by 70 kg default body weight to obtain dermal dose (Thongsinthusak <i>et al.</i> , 1993).	
ⁱ Total Dermal ADD is the sum of ADD for hands and Dermal ADD.	

APPENDIX 14: CALCULATION OF PARAMETERS USED IN ESTIMATING INHALATION EXPOSURE TO WORKERS DIPPING NURSERY STOCK

SWIMODEL estimates ambient vapor concentration of a chemical from its air-water partitioning using its unitless Henry's Law constant, which is calculated as follows (U.S. EPA, 2003):

$$C_{vp} = H' * C_w * (1,000 \text{ L/m}^3)$$

where

C_{vp} ($\mu\text{g/m}^3$) is the concentration of the pesticide in air;

H' is the unitless Henry's Law constant; and

C_w is the concentration of chemical in water ($\mu\text{g/L}$).

The unitless Henry's Law constant is calculated based on the Henry's Law constant in units of $\text{atm}\cdot\text{m}^3/\text{mole}$ using the following equation:

$$H' = H/(R * T)$$

where

H' is the unitless Henry's Law constant;

H is the aqueous Henry's Law constant ($\text{atm}\cdot\text{m}^3/\text{mole}$);

R is the gas constant ($8.19 \times 10^{-5} \text{ atm}\cdot\text{m}^3/\text{mole}\cdot\text{K}$); and

T is the ambient air temperature (degrees Kelvin, or 273 added to degrees Celsius).

SWIMODEL calculates the potential dose rate in mg per event ($AD_{\text{Inhalation}}$) as:

$$AD_{\text{Inhalation}} = C_{vp} * ET * IR * (1 \text{ mg}/1,000 \mu\text{g})$$

where

C_{vp} ($\mu\text{g/m}^3$) is the concentration of the pesticide in air;

ET (hrs/event) is exposure time; and

IR (m^3/hr) is inhalation rate.

However, endosulfan products contain additives to increase water solubility. Because of this, the vapor concentration calculated from the SWIMODEL equation is quite high, perhaps above concentrations that could actually occur. To check this, the equation used to estimate vapor pressure by the gas saturation method (U.S. EPA, 1996) can be re-arranged to provide an estimate of saturated vapor concentration based on reported vapor pressure. The equation is given below.

$$C_{\text{sat}} = [(VP/760) * MW * (1,000 \text{ mg/g})(1,000 \text{ L/m}^3)]/R*T$$

where

C_{sat} ($\mu\text{g/m}^3$) is the saturated concentration of the pesticide in air;

MW is the molecular weight;

R is the gas constant ($8.19 \times 10^{-5} \text{ atm}\cdot\text{m}^3/\text{mole}\cdot\text{K}$); and

T is the ambient air temperature (degrees Kelvin, or 273 added to degrees Celsius).

Appendix 14, Continued...

The estimated C_{sat} is given in Table 14-1. This value is considerably lower than the estimated C_{vp} , suggesting that C_{vp} is unrealistically high. Therefore, C_{sat} was used in calculating inhalation exposure.

A default value of 20 m³/day was used for IR (Andrews and Patterson, 2000); this value assumes moderate to heavy activity during an 8-hour workday. Because IR is given for the workday rather than on an hourly basis, ET is set to 1 day in the exposure calculation. This result is multiplied by 0.1 for use of a respirator (NIOSH, 1987). The inhalation contribution to the ADD is calculated by dividing the inhalation exposure estimate by the default body weight of 70 kg (Thongsinthusak *et al.*, 1993). Exposure estimates are given in Table 14-1.

Table 14-1. Inhalation Endosulfan Exposure Estimate Based on SWIMODEL Equations ^a

Parameter	Value
H^b	0.00175
C_{vp}^c	1.05×10^7
C_{sat}^d	1,682
$AD_{\text{Inhalation}}$ (mg per day) ^e	3.36
Inhalation ADD (mg/kg/day) ^f	0.048
^a $C_w = 6,000$ mg AI/L for endosulfan (concentration in solution prepared according to directions on Thiodan [®] 3EC product label). ^b Unitless Henry's Law constant. See text for equation. ^c Calculated concentration of pesticide in air. See text for equation. ^d Saturated vapor concentration. See text for equation. ^e Estimated inhalation exposure per day. See text for equation. C_{sat} used for C_{vp} , IR = 20 m ³ /day, ET = 1 day. Exposure was multiplied by 0.1 for use of a respirator (NIOSH, 1987). ^f ADD is absorbed daily dose. To calculate, $AD_{\text{inhalation}}$ divided by 70 kg default body weight to obtain dose (Thongsinthusak <i>et al.</i> , 1993).	

**APPENDIX 15: EFFECTS OF MITIGATION MEASURES PROPOSED IN
ENDOSULFAN RED ON EXPOSURE ESTIMATES**

Exposure estimates in this exposure assessment document (EAD) were based on labeling that is currently in effect. U.S. EPA released the Reregistration Eligibility Decision (RED) for endosulfan in November 2002 (U.S. EPA, 2002a). Many of the mitigation measures proposed in the RED would change handler and reentry exposure estimates. These are briefly summarized in this appendix, and revised exposure estimates are given for future reference.

All uses of endosulfan would be deleted for the following crops: succulent beans, succulent peas, spinach, grapes, and pecans. Endosulfan use on tobacco would be restricted to six eastern states, and use would not be allowed in states such as California. Uses of wettable powder (WP) products would be canceled in several crops, such as tomatoes, sweet corn, and cotton. Aerial applications of WP products would not be allowed in several other crops, including tree fruits and nuts, which have the highest application rates; aerial applicator exposure estimates would be affected. All WP products would be in water soluble packaging, which would eliminate the highest M/L exposure estimates.

A few changes in application rates were proposed for specific crops or use sites in U.S. EPA (2002a). Many of these would not apply in California, either because products are not registered in California or because endosulfan products registered in California already list the proposed maximum application rates. Proposed application rate changes that would affect worker exposure estimates include a decrease in rates allowed with high pressure handwand sprayers (to 0.005 lbs AI/gallon) and a decrease in the maximum application rate allowed on strawberries, from 2.0 lbs AI/acre to 1.0 lb AI/acre. This would decrease exposure estimates for strawberry harvesters.

Closed M/L systems would be required for aerial applications of emulsifiable concentrate (EC) products on all crops in which WP aerial uses were canceled, and to most crops in which WP uses were canceled completely. Because closed M/L systems are required under California law, this proposed measure would not affect exposure estimates. Closed cab would be required for airblast applications to tree crops, which would result in lower estimates. Since the release of U.S. EPA (2002a), the Agricultural Handlers Exposure Task Force has submitted an exposure monitoring study for airblast applicators driving open-cab tractors and wearing chemical-resistant headgear (Smith, 2005). This study resulted in lower estimates for open-cab airblast applicators than estimates based on PHED, but not as low as closed-cab airblast applicator exposure estimates.

Changes in handler exposure estimates due to proposed mitigation measures are summarized in Table 15-1.

Table 15-1. Estimates of Pesticide Handler Exposure to Endosulfan Based on Mitigation Measures Proposed in the Reregistration Eligibility Decision ^a

Scenario ^b	STADD ^c (mg/kg/day)		SADD ^c (mg/kg/day)		AADD ^c (mg/kg/day)		LADD ^c (mg/kg/day)	
	Old	New	Old	New	Old	New	Old	New
<u>Aerial</u> ^d								
M/L EC	0.225	0.180	0.034	0.034	0.011	0.011	0.006	0.006
M/L WSP	0.185	0.074	0.044	0.030	0.015	0.010	0.008	0.005
Applicator	0.790	0.632	0.158	0.158	0.053	0.053	0.028	0.028
Flagger	0.373	0.298	0.057	0.057	0.019	0.019	0.010	0.010
<u>Airblast</u> ^e								
M/L EC	0.026	0.026	0.006	0.006	0.001	0.001	0.0006	0.0006
M/L WSP	0.021	0.021	0.008	0.008	0.001	0.001	0.0008	0.0008
Applicator	0.188	0.052	0.048	0.013	0.008	0.002	0.004	0.001
<u>GB</u>								
M/L EC	0.041	0.041	0.008	0.008	0.003	0.003	0.001	0.001
M/L WSP	0.034	0.034	0.010	0.010	0.004	0.004	0.002	0.002
Applicator	0.045	0.045	0.005	0.005	0.002	0.002	0.001	0.001
<u>BP</u>								
M/L/A EC	0.043	0.043	0.011	0.011	0.002	0.002	0.001	0.001
<u>HPHW</u> ^f								
M/L/A EC	0.511	0.256	0.153	0.077	0.026	0.013	0.014	0.007
<u>LPHW</u>								
M/L/A EC	0.013	0.013	0.003	0.003	0.0005	0.0005	0.0003	0.0003
<u>Dip</u>								
M/L EC	0.00003	0.00003	NA	NA	NA	NA	NA	NA
M/L WP	0.0003	0.0003	NA	NA	NA	NA	NA	NA
Applicator	41.4	41.4	NA	NA	NA	NA	NA	NA

^a Mitigation measures proposed in U.S. EPA (2002a).

^b Abbreviations: EC = emulsifiable concentrate. M/L = mixer/loader. M/L/A = mixer/loader/applicator. WP = wettable powder. WSP = water soluble packaging containing wettable powder. Because WP would be in WSP, M/L and M/L/A scenarios involving WP were omitted (only EC and WSP were included).

^c Combined dermal and inhalation exposure estimates. “Old” estimates are based on existing product labels; calculations are shown in Tables 17 - 20. “New” estimates incorporate proposed mitigation measures; changed estimates (affected by proposed mitigation) are shown in bold, while unchanged estimates are not. Abbreviations: STADD = Short-Term Absorbed Daily Dosage. SADD = Seasonal Average Daily Dosage. AADD = Annual Average Daily Dosage. LADD = Lifetime Average Daily Dosage.

^d “New” short-term aerial estimates other than M/L WSP assumed maximum application rate of 2.0 lbs AI/acre, proposed maximum rate on tree fruit (U.S. EPA, 2002a). All M/L WSP estimates assumed a maximum rate of 1.0 lb AI/acre.

^e “New” airblast applicator exposure estimates assumed use of a closed cab, as proposed in U.S. EPA (2002a).

^f “New” HPHW M/L/A exposure estimates assumed maximum application rate of 0.005 lbs AI/gallon, as proposed in U.S. EPA (2002a).

To mitigate reentry worker risk, U.S. EPA (2002a) proposed lengthening the baseline restricted entry interval (REI) from 24 hours to 48 hours. In California, current regulations already require a baseline REI of 48 hours (Title 3 Code of California Regulations, Section 6772), and reentry exposure estimates would not be affected by this proposed mitigation measure. However, longer REIs were proposed for some crops; these are listed in Table 15-2.

Table 15-2. Formulation-Specific Restricted Entry Intervals (REIs) Proposed in Endosulfan Reregistration Eligibility Decision^a

Crop	REI (days)	
	WP	EC
Melons, cucurbits	3	2
Lettuce, celery, pome fruit, stone fruit, citrus, collard greens, kale, mustard greens, radish, turnip, rutabaga, ornamental trees and shrubs	4	2
Collard greens (seed), kale (seed), mustard greens (seed), radish (seed), turnip (seed), rutabaga (seed)	5	2
Broccoli, cauliflower, kohlrabi, cabbage, Brussels sprouts	9	4
Broccoli (seed), cabbage (seed), cauliflower (seed), kohlrabi (seed)	12	7
Sweet potato	NA ^b	3
Sweet corn	NA	17
^a Proposed in U.S. EPA (2002). California regulations require a minimum REI of 2 days (Title 3 Code of California Regulations, Section 6772). WP = wettable powder products. EC = emulsifiable concentrate products.		
^b NA: not applicable. Use of WP endosulfan products would not longer be allowed.		

U.S. EPA (2002a) used formulation-specific DFR curves in estimating exposure, based on data later published by Whitmyre *et al.* (2004). Thus, many proposed REI changes were formulation-specific, as shown in Table 15-2. Table 15-3 shows revised exposure estimates for reentry workers based on changes in application rate (for strawberry harvesters) and REI shown in Table 15-3. As DFR data used in exposure estimates in this EAD followed applications of WP formulations (Table 10), revised exposure estimates based on the proposed WP REI are given in Table 15-3.

1 **Table 15-3. Reentry Worker Exposure Estimates to Endosulfan Based on Mitigation**
 2 **Measures Proposed in the Reregistration Eligibility Decision ^a**

Exposure scenario	STADD ^b (mg/kg/day)	SADD ^c (mg/kg/day)	AADD ^d (mg/kg/day)	LADD ^e (mg/kg/day)
Almond, Hand Harvesting ^f	0.012	NA	NA	NA
Almond, Thinning ^f	0.007	NA	NA	NA
Broccoli, Hand Harvesting ^g	0.019	0.006	0.0009	0.0005
Broccoli, Scouting ^g	0.015	0.005	0.0011	0.0006
Citrus, Thinning ^h	0.037	NA	NA	NA
Sweet Corn, Hand Harvesting ⁱ	0.028	0.020	0.002	0.001
Cotton, Scouting ^j	0.082	0.009	0.001	0.0008
Cucumber, Hand Harvesting ^k	0.039	0.007	0.001	0.0007
Grape, Cane Turning ^l	NA	NA	NA	NA
Lettuce, Scouting ^m	0.018	0.002	0.001	0.0005
Cut Flowers, Hand Harvesting ⁿ	0.121	NA	NA	NA
Ornamental Plants, Hand Harvesting ⁿ	0.007	NA	NA	NA
Peach, Thinning ^o	0.037	0.015	0.003	0.001
Potato, Scouting ^j	0.055	0.004	0.002	0.001
Strawberry, Hand Harvesting ^p	0.034	NA	NA	NA
Tomato, Hand Harvesting ^j	0.17	0.009	0.003	0.002

^a Mitigation measures proposed in U.S. EPA (2002a). Changed estimates (affected by proposed mitigation) are shown in bold, while unchanged estimates are not. See Tables 21 and 22 for exposure estimates based on current product labels; Table 21 also contains transfer coefficients used in exposure estimates.

^b Short-Term Absorbed Daily Dosage (STADD) is an upper-bound estimate of exposure.

^c Seasonal Average Daily Dosage is a mean estimate of absorbed dose, calculated as described in text.

^d Annual Average Daily Dosage = ADD x (annual use months per year)/(12 months in a year).

^e Lifetime Average Daily Dosage = AADD x (40 years of work in a lifetime)/(75 years in a lifetime).

^f Change in maximum application rate to 2.0 lbs AI/acre. DFR for STADD, hand harvesting = 0.27 µg/cm². DFR for STADD, thinning = 0.09 µg/cm².

^g Change in REI to 9 days. DFR for STADD = 0.07 µg/cm². DFR for SADD = 0.021 µg/cm².

^h Change in REI to 4 days. DFR for STADD = 0.23 µg/cm².

ⁱ Change in REI to 17 days. DFR for STADD = 0.031 µg/cm². DFR for SADD = 0.022 µg/cm².

^j No change in exposure estimates for this scenario.

^k Change in REI to 3 days. DFR for STADD = 0.29 µg/cm². Other estimates unchanged.

^l Endosulfan use on grapes would be discontinued.

^m Change in REI to 4 days. DFR for STADD = 0.22 µg/cm². DFR for SADD = 0.029 µg/cm².

ⁿ Change in REI to 4 days. DFR for STADD = 0.32 µg/cm².

^o Change in REI to 4 days. DFR for STADD = 0.23 µg/cm². DFR for SADD = 0.093 µg/cm².

^p Change in maximum application rate to 1.0 lbs AI/acre. DFR for STADD = 0.42 µg/cm².

APPENDIX F

Endosulfan. Department of Pesticide Regulation Response to USEPA's
Review of California's Endosulfan Risk Characterization Document



Department of Pesticide Regulation



Mary-Ann Warmerdam
Director

Arnold Schwarzenegger
Governor

DATE: May 25, 2007

TO: Gary T. Patterson, Ph.D., Chief
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FROM: Marilyn Silva, Ph.D., D.A.B.T., Toxicologist
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VIA: Joyce Gee, PhD., Senior Toxicologist,
Medical Toxicology Branch,
Department of Pesticide Regulation,
California Environmental Protection Agency

SUBJECT: Endosulfan. Department of Pesticide Regulation Response to USEPA's
Review of California's Endosulfan Risk Characterization Document

This document "*Department of Pesticide Regulation Response to USEPA's Review of California's Endosulfan Risk Characterization Document*" was generated to respond to the January 31, 2007 comments by USEPA on the draft risk assessment document of December 5, 2006.

Toxicology:

USEPA COMMENT: A comparison of the risk assessments produced by CDPR in 2006 and the Agency in 2002 and currently in 2007 reveals two major differences in hazard assessment. The first difference is the lack of the use of the DNT study (Gilmore, 2006; MRID 46968301) in risk assessment by CDPR. The Agency is currently planning to use the DNT study for the dermal short- and intermediate-term scenarios.

DPR RESPONSE: USEPA selected a dermal NOEL of 1.2 mg/kg/day for short term (1-30 days) and intermediate term (1-6 months) from "co-critical studies"; the rat reproduction study, based on decreased body weight (NOEL = 1.18 mg/kg/day, Edwards et al., 1984) and the DNT study, based on decreased pup weight (LOAEL = 3.74 mg/kg/day—no NOEL established according to their review; Gilmore, 2006). This information, obtained from Table 1 in the USEPA MEMORANDUM, was added to the DPR RCD. In contrast, DPR did not establish a subchronic dermal endpoint, since there were no FIFRA Guideline acceptable studies. Instead



DPR used the subchronic oral NOEL from the rat reproduction study (1.18 mg/kg/day; dermal penetration factor of 47.3%), since this was a lower NOEL than DPR identified for the DNT study and it was also an acceptable FIFRA Guideline study.

USEPA COMMENT: Furthermore, the established endpoints of the DNT study by CDPR differ from the identified endpoints by the Agency and are described briefly below.

DNT- (Gilmore et al., 2006; MRID 46968301)

The Agency recently received a developmental neurotoxicity study with endosulfan in Wistar rats in December 2006. The study was reviewed and the findings then presented to the Developmental Neurotoxicity Committee on January 10, 2007. Based on the review of the study by the DNT Committee, the Committee concluded that there was no NOAEL for pups. The LOAEL of 3.74 mg/kg/day was the lowest dose tested (LDT), based on decreased pup weight [PND 11] and weight gain [PND 4-11], with delayed preputial separation in males receiving the MDT. For dams, the NOAEL is 3.74 mg/kg/day. The LOAEL for dams is 10.8 mg/kg/day, based on decreased body weight, food consumption and food efficiency. This study is acceptable/guideline. The data evaluation record (DER) is currently being revised to reflect changes requested by the DNT Committee.

DPR RESPONSE: The maternal NOEL was less than 3.74 mg/kg/day, based upon lower mean body weights (5 - 6%) and lower food consumption (12%) at 3.74 mg/kg/day. While these decreases are marginal, the trend is dose-related and therefore DPR chose to note it as a treatment-related effect. The developmental NOEL was less than 3.74 mg/kg/day based upon the lower mean body weights (8% on post-partum day 11 only) of the offspring at 50 ppm. USEPA pointed out that there was also a decreased body weight gain in pups that was noted on post-partum day 11 only. It was therefore considered by DPR to be a transitional effect, but it will be noted in the DPR RCD

USEPA COMMENT: The second difference among the risk assessments is the critical study identified for the acute dietary assessment. CDPR used the developmental rabbit study (MRID 00094837) NOEL of 0.7 mg/kg/day, based on convulsions that were considered acute effects by CDPR. The Agency, however, established the salivation, convulsions, rapid breathing, and hyperactivity observed at 1.8 mg/kg/day to only occur on day 10 of gestation (not gestation day 6 as indicated by CDPR). Therefore the Agency relied on the acute neurotoxicity study (MRID 44403101) NOAEL of 1.5 mg/kg/day since convulsions were observed 8 hours after a single oral dose, thus making the endpoint more appropriate for the acute dietary assessment.

DPR RESPONSE: The acute oral effects observed in a developmental toxicity study performed in the rabbit, included maternal signs within the first day of treatment (in the absence of fetal effects). Various clinical signs were observed in dams/does, including abortions, phonation, coughing, cyanosis, convulsions/ thrashing, noisy/rapid breathing, hyperactivity, salivation, and nasal discharge and death (Nye, 1981). Clinical signs began on gestation day 6 (day 1 of treatment) at 1.8 mg/kg/day. In particular, hyperactivity was observed only at 1.8 mg/kg/day (no convulsions; thrashing, phonation, coughing, and cyanotic only; page 14 of the report by Nye, 1981). The NOEL for this study was 0.7 mg/kg/day. Similar effects were observed in 2 rangefinding studies also performed in pregnant New Zealand rabbits (Fung, 1981a, b). In these studies the LOELs were 1.0 mg/kg/day, based on neurotoxicity and deaths beginning day 8 of

gestation (treatment day 2). There were no major deficiencies in the rabbit developmental study and it provided the lowest acute oral NOEL. The other studies described above, showed that female rats are more sensitive to acute oral endosulfan treatment than are males and that pregnant female rabbits are more sensitive to endosulfan than are both non-pregnant and pregnant rats. Although the rabbit developmental study involved multiple dosing, rather than a single acute oral dose of endosulfan, the neurotoxic effects were seen on the first day of treatment and were therefore acute oral effects. Therefore, this study, with a critical NOEL of 0.7 mg/kg, was selected as the definitive study for evaluating acute dietary exposure and to calculate the MOE for potential acute single-day (non-inhalation) human exposures to endosulfan.

DPR made no changes to Table 43 in the RCD. It remains as viewed by USEPA prior to your response, with data from the RED, 2002. It has been noted in the RCD that certain endpoints and FQPA factors are under reevaluation by USEPA and that DPR will update the RCD when the data are received.

Dietary Assessment

USEPA CONCERNS AND COMMENTS: HED has the following comments on the dietary portion of the CDPR endosulfan characterization document. It is important to note that the original CDPR dietary assessment is from 1998. There is an addendum dated September 2006 that addresses the need for a complete revision of the 1998 dietary assessment. A complete reassessment was not conducted. Comparisons will be made between the 1998 CDPR assessment (and addendum) and the 2002 HED dietary assessment. The 2002 HED dietary assessment is likely to change in the near future based upon review of additional submitted data.

HED does not usually present screening level assessments if a more refined assessment has been done. HED only presents the more refined assessment. The CDPR assessment includes data that has been refined (with percent crop treated and PDP monitoring data) as well as a general screening assessment assuming 100% crop treated and tolerance level residues.

Neither assessment included consumption data for drinking water.

The CDPR assessment discusses populations upon which HED does not normally base regulatory decisions on.

The CDPR assessment discusses acute exposures at the 95th percentile. HED typically bases regulatory decisions on the 99.9th percentile.

The CDPR dietary assessment from 1998 used the TAS, Inc EXTM acute and chronic dietary exposure software (TAS, 1996). The 2002 HED dietary exposure assessment used the DEEMTM dietary exposure model. The dietary modeling software program is important to determine if the recipes and age groupings are the same as those used by HED. In other words, an assessment done with a program other than DEEM cannot be directly compared to an assessment done with DEEM. The results could vary based upon this fact. Both HED and CDPR now use the DEEM-

FCID™ modeling software. Also, the DEEM™ food recipe libraries may well differ from those used by the TAS, Inc EX™ software.

The TAS, Inc EX™ acute and chronic dietary exposure software analyzes acute exposure, seasonal exposure for California workers, chronic exposure (1 year), and lifetime exposure (oncogenic). Since DPR had no oncogenic exposure factor for endosulfan, a lifetime dietary exposure was not performed. HED conducts acute and chronic (lifetime - age 0 to 85 years) dietary exposure assessments.

The CDPR assessment and the most recent HED risk assessment completed (Endosulfan RED, 2002) both used the same Continuing Survey of Food Intake by Individuals (CSFII) consumption database from 1989-1992. There is a newer database that is currently in use by both HED and DPR (CSFII 1994-1996 and 1998). This newer consumption database will be used in the event the upcoming HED endosulfan risk assessment conducts quantitative dietary risk calculations.

The CDPR assessment used residue data from the following sources: DPR monitoring program (1993-1995), registrant field residue trials, USDA 1994 or 1996 PDP monitoring program, or USDA 1995 FSIS residue monitoring program. A US EPA tolerance level was only used as the exposure value for sugarcane and its processed commodities. The 2002 HED assessment used a combination of data from PDP, FDA, and registrant field trials. HED typically uses the most recent 5 years of monitoring data and the assessments are supposed to be updated using anticipated residues every 5 years.

For the reasons listed in the draft document, HED agrees with the CDPR conclusion regarding the 2006 dietary addendum being sufficient when combined with the prior 1998 DPR dietary exposure assessment. With the nine tolerances canceled or proposed for cancellation by the registrant and 5 tolerances revoked by the Agency (72 uses decreased to 58), decreased maximum application rates for a number of commodities, along with the fact that the FQPA safety factor is likely to be reduced, it is highly unlikely that dietary risks will exceed the Agency's level of concern. This same rationale will likely be used in conducting the forthcoming 2007 HED dietary risk assessment.

DPR RESPONSE: The USEPA dietary exposure comments are part of the memo from Dr. D. Wilbur et al. to Dr. T. Perry dated January 31, 2007 (USEPA, 2007).

The memo did not contain any comments that require a DPR response. The dietary exposure section of the DPR draft endosulfan RCD is addressed on page 9 of the 16 page USEPA memo. Specifically, the memo agrees with the conclusion of the DPR RCD that the DPR dietary exposure addendum (dated September 29, 2006) combined with the 1998 DPR assessment are sufficient to address dietary exposure concerns. Therefore, an updated DPR dietary exposure assessment is unnecessary. DPR concurs with the U.S. EPA statement.

USEPA COMMENT: HED used an acute endpoint of 1.5 mg/kg/day (with an uncertainty factor of 100 and a FQPA safety factor of 10) and a chronic endpoint of 0.6 mg/kg/day (with an uncertainty factor of 100 and a FQPA safety factor of 10). CDPR used an acute endpoint of 0.7 mg/kg/day and a 0.57 mg/kg/day chronic endpoint. There is also mention of a NOEL of 0.25

mg/kg/day used as a chronic endpoint. This is referred to in Appendix A (original 1996 dietary assessment). [page 8 of 16 of Memorandum]

DPR RESPONSE: The NOEL for the chronic dog study mentioned in the Appendix A (original 1998 dietary assessment) was an error and was corrected to 0.57.

NOTE: A response to the comments on Occupational/Residential Assessment is being prepared by the Worker Health and Safety Branch as a separate document.

APPENDIX G.

DPR RESPONSE TO THE OEHHA COMMENTS AND RECOMMENDATIONS REGARDING THE DRAFT RISK CHARACTERIZATION DOCUMENT FOR ENDOSULFAN



Department of Pesticide Regulation



Mary-Ann Warmerdam
Director

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Governor

DATE: May 25, 2007

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FROM: Marilyn Silva, Ph.D., D.A.B.T., Toxicologist
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VIA: Joyce Gee, PhD., Senior Toxicologist,
Medical Toxicology Branch,
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California Environmental Protection Agency

SUBJECT: DPR RESPONSE TO THE OEHHA COMMENTS AND
RECOMMENDATIONS REGARDING THE DRAFT RISK CHARACTERIZATION
DOCUMENT FOR ENDOSULFAN

Thank you for your helpful comments. They were thorough and we believe they have greatly improved the document. Following below are the responses to the OEHHA recommendations.

Major Comments

Major Comment #1: OEHHA disagrees with the RCD's use of oral studies to evaluate inhalation exposures. In Tables 35-38, margins of exposure (MOEs) are calculated for persons exposed to endosulfan via the inhalation route. The inhalation MOEs are calculated using no-observed-effects-levels (NOELs) from studies in which the animals were exposed to endosulfan via the oral/dietary route. However, Table 11 shows that rats exposed subchronically to endosulfan were significantly more sensitive via the inhalation route compared to the dietary route: 10-fold more sensitive comparing the subchronic inhalation NOEL to the subchronic dietary NOEL, and 6-fold more sensitive comparing the subchronic inhalation NOEL to the week 24 parental NOEL determined in the two-generation dietary study. For both of these comparisons, the inhalation lowest-observed-effects-level (LOEL) was lower than the corresponding oral NOEL (Table 11), demonstrating that differences in dose selection were not responsible for the apparently greater sensitivity of the inhalation route. Therefore, OEHHA recommends using the subchronic inhalation study in the rat (Hollander et al., 1984) to evaluate subchronic/seasonal inhalation exposures to endosulfan. This study conformed to Federal



Insecticide, Fungicide, and Rodenticide Act guidelines, and was designated “acceptable” by reviewers from both U.S. EPA and DPR.

Since an “acceptable” subchronic inhalation study is available, OEHHHA recommends it be used to calculate all subchronic inhalation MOEs. The draft RCD calculates subchronic inhalation MOEs for members of the general public in Table 38 using this inhalation study. However, an oral study is used for calculating subchronic inhalation MOEs for workers (changed to Tables 36, 37 and 38). Unless justification can be provided, OEHHHA recommends that this apparent inconsistency be corrected by applying the same subchronic inhalation study by Hollander et al. (1984) to subchronic inhalation MOE calculations for both workers and members of the general public.

Since no acceptable acute or chronic inhalation studies are available, a decision is required as to what study should be used to calculate inhalation MOEs for those exposure periods. Looking at the oral NOELs from the rat studies presented in Tables 10-12 (now Tables 11-13) of the RCD, they were 2.0, 1.18 and 0.6 mg/kg-day for the developmental (acute), subchronic and chronic studies, respectively. This is a relatively narrow range for acute through chronic dosing in the same species via the oral route. A similar narrow range may exist for exposures via the inhalation route. Therefore, OEHHHA recommends using the subchronic inhalation NOEL, possibly with an adjustment factor, for calculating all (acute, subchronic/seasonal and chronic) inhalation MOEs.

DPR RESPONSE: DPR agrees and the subchronic inhalation study with a NOEL of 0.194 mg/kg/day was used for relevant acute and subchronic occupational exposures and MOEs and for acute and subchronic ambient air and bystander exposure scenarios. For chronic inhalation exposures and MOEs, a 10x adjustment was used to extrapolate from subchronic to chronic (ENEL = 0.0194 mg/kg/day). These new estimations are presented in corresponding tables in the RCD. For the combined exposures and combined MOEs, however, the occupational total (dermal + inhalation) exposures in combination with the dietary exposures were used with the oral NOELs (except in the case of the ambient air and bystander MOEs).

Major Comment #2: OEHHHA recommends using the most recent pesticide residue and food consumption data sets to estimate dietary exposures to endosulfan. Some raw agricultural commodities (RACs) measured in the more recent residue monitoring program (United States Department of Agriculture Pesticide Data Program, 1994 for broccoli only and 1997-2004 annual summaries) exhibited increased endosulfan residue concentrations (Now Table 25, formerly Table 24) compared to the older residue data used in the RCD’s exposure assessment (DPR 1993-1995 market basket program). In addition, the per person consumption rates of some RACs treated with endosulfan were higher in the more recent Continuing Survey of Food Intake by Individuals (1994-98 CSFII) compared to the older food consumption data set used in the RCD’s dietary exposure assessment (1989-92 CSFII). Thus, it is possible that some dietary exposures to endosulfan, calculated using the newer data sets, would be higher than the exposures calculated in the RCD. Therefore, OEHHHA recommends doing the dietary exposure assessment with the two more recent data sets. Given some of the low acute dietary margins of exposure (MOEs) for some of the population subgroups shown in Table 40 (changed to Table 41), this seems the prudent thing to do.

DPR RESPONSE: The comment at the top of page 3, first paragraph, regarded the need to redo the DPR dietary exposure assessment. The DPR dietary exposure assessment resulted in acute and chronic MOEs that were more than sufficient when originally conducted. The MOEs were greater than 100 for all population subgroups using pesticide use rates and existing endosulfan tolerances in effect during 1998. The 1998 DPR dietary exposure assessment combined with the information in the DPR dietary exposure addendum suggest that additional refinement is unnecessary (Carr, 1998, 2006). In particular, the DPR addendum was written to indicate why the original 1998 assessment is still acceptable. The addendum summarized the label reductions and tolerance cancellations proposed in the draft U.S. EPA 2002 endosulfan RED, similarities between the 1989-92 and 1994-98 CSFII consumption databases and differences between the USDA-PDP and DPR residue programs. Since the acute and chronic MOEs from the 1998 DPR assessment are adequate, the DPR concluded that updating the endosulfan dietary exposure assessment would not likely result in MOEs of 100 or lower. To the contrary, based on data summarized in the DPR addendum, it is likely the MOEs would improve if the dietary exposure assessment were to be updated. Therefore, it was determined that this would not be an effective use of limited DPR staff resources. The U.S. EPA reviewed the DPR draft endosulfan RCD and reached a similar conclusion regarding the sufficiency of the dietary exposure assessment (Silva, 2006; U.S. EPA, 2007).

Major Comment #3: On pages 47-48 the RCD discusses endocrine effects of endosulfan in young rats. Two studies detected effects on male reproductive endpoints at low dose levels: decreased spermatid counts, decreased sperm counts and sperm abnormalities at 2.5 mg/kg-day in 3 week-old animals (Sinha et al., 1997), as well as decreased weight of testes, epididymis, ventral prostate and seminal vesicle at 1.0 mg/kg-day in 6 week-old animals (Chitra et al., 1999). The latter value of 1.0 mg/kg-day is lower than the LOELs of all critical studies selected for calculating oral MOEs (Tables 10-12, changed to Tables 11-13). OEHHHA recommends discussing the reasons these effects on male reproductive organs/function were not chosen as the critical effects for risk assessment.

DPR RESPONSE: The following information was added to the RCD (page 168).

Many recent studies with neonatal or prepubescent male animals and pubescent human males have implicated endosulfan with effects on the development of the reproductive tract or sperm (Ahmad et al., 1993, Dalsenter, et al., 1999, 2003; Saiyed et al., 2003). Prepubescent male rats were susceptible to effects of endosulfan on reproductive organs following repeated dosing, while humans (Saiyed et al., 2003) showed effects to testosterone and LH. The main problem with the open literature studies, however, is that clinical signs were either not reported or not measured. Therefore, it is not known at what doses effects to the reproductive tract occur, compared to doses that induce neurotoxicity.

With regard to the Saiyed, et al., 2003 study, the only thing that can be concluded is that the children exposed to endosulfan had a higher blood level of endosulfan (1.37 ± 0.23 ppb, control; 7.47 ± 1.19 ppm, exposed). Sexual maturation appeared to be delayed; however, the authors state the weakness in the study are 1) non-participation in the SMR (57% of the exposed and 33% of the control participants did not agree to undergo SMR examination). 2)

Blood was collected only once from participants and sex hormone levels can vary depending on individual variation and time of day (personal cycle). The random variability of the sex hormone levels was stated to weaken the power of the study. The authors conclude that a study with a larger sample size must be performed and that a long-term follow up must be done on individuals in order to understand the implications or suggestions initially identified. Further criticism was published in “Perspectives – Correspondence: Endosulfan’s Effects: Omissions and Flawed Data” (Abraham, C.C.) and “Endosulfan’s Effects: Inaccurate Data,” (Indulkar, A.S.) along with “Endosulfan’s Effects: Saiyed’s Response,” (Saiyed, H.N.); Environmental Health Perspectives, 112(10): A538 – A541, 2004. Information presented in this paper yields at best a suggestion of an effect by endosulfan, however this paper cannot be used as a strong basis for effects in humans.

Zaidi et al. (1985) showed rat pups receiving endosulfan had increased ^3H -serotonin binding to frontal cortical membranes that correlated with increased foot-shock induced fighting behavior at 1.0 mg/kg/day (adult rats were affected, with less sensitivity at 3.0 mg/kg/day). This indicates a greater sensitivity in neonatal animals than adults. Studies with neonatal (3 week old) rats showed decreased intratesticular sperm counts and increased percentage of abnormal sperm at lower doses than observed in 3-month-old adults (Sinha et al., 1995 and 1997).

The study by Chitra et al. (1999) treated Wistar male prepubertal (45 day old) rats by gavage with endosulfan technical at 1.0 mg/kg/day (6 animals) for 30 days (Chitra, et al., 1999). While results at termination showed statistically significant effects in reproduction parameters (decreased testes, epididymal, ventral prostate, and seminal vesicle weights) and effects to 3- β OH-steroid dehydrogenase among other biochemical parameters relating to testicular metabolism. These findings suggest a possible connection between endosulfan treatment and steroidogenesis inhibition in male rats. However, there were major deficiencies in this study (only 6 animals treated, only a single dose, no individual data were shown, and there was a great deal of variation in assay results) that prevent its use as a critical endpoint study. More recent studies, such as the developmental neurotoxicity study reported in 2006 (Gilmore et al.) that is an acceptable FIFRA Guideline study, provide more reliable data for regulatory purposes.

Minor Comments

OEHHA COMMENT: Page two, third paragraph. Recommend explaining what a “centrally acting agent” is.

DPR RESPONSE: This sentence now reads: There is a concern about hazards caused by the interaction of endosulfan and therapeutic agents that act on the central nervous system, since endosulfan is a potent MFO inducer.

OEHHA COMMENT: Page four, second paragraph. “Of the 55 illnesses resulting from exposure to endosulfan in combination with other pesticides, 42 occurred as the result of exposure to residue, ...” Recommend clarifying whether these were field residues, or some other type of residue.

WH & S RESPONSE: The word "field" was inadvertently omitted. I've added it ("field residues on treated crops"). Also, addition of the 2004 PISP data added a single illness, also in a fieldworker exposed to field residues. The first 3 paragraphs of the Reported Illnesses currently read as follows (note changes in some of the numbers):

Reports of illness and injury with definite, probable, or possible exposure to pesticide products are recorded in a database maintained by the Pesticide Illness Surveillance Program (PISP) at DPR. The PISP database contains information about the nature of the pesticide exposure and the subsequent illness or injury. In California between 1992 and 2004, 63 illnesses were reported to the Pesticide Illness Surveillance Program that suggested the involvement of endosulfan, alone or in combination with other pesticides (Verder-Carlos, 2006). Of the 63 illnesses, 61 resulted from agricultural applications and just two from non-agricultural applications. Five agriculturally-related and both of the non-agriculturally-related illnesses and injuries were attributed solely to endosulfan; the other 56 reports were associated with endosulfan in combination with other pesticides.

Of the seven illnesses and injuries attributed solely to endosulfan, one occurred as the result of exposure to field residues, three resulted from handling processes (mix/load, apply), two resulted from drift, and one followed a non-specified exposure. Of the 56 illnesses resulting from exposure to endosulfan in combination with other pesticides, 43 occurred as the result of exposure to field residues on treated crops, six occurred during the application process (mix/load, apply, flag), and seven occurred as the result of drift exposure.

Table 2 summarizes types of symptoms reported in association with endosulfan exposure. The majority of illnesses involved skin and eye effects, such as irritation and rashes. Several incidents involved more than one worker. None of the incidents resulting in multiple exposure involved endosulfan as the only pesticide. Of the 44 field worker illnesses and injuries, 31 (70%) harvesting cucurbits (melons, cucumbers), and seven (16%) occurred while working in grapes. The remaining six (14%) occurred in various other crops.

The illness summary table also gets an addition, into the "Skin" column, which has 23 reports associated with endosulfan with other pesticides, for a total of 24. The last column totals are now 7, 56, and 63.

OEHHA COMMENT: Page four, last paragraph. If available, recommend stating the length of exposure rather than "prolonged."

WH & S RESPONSE: The paragraph is changed as follows:

In the southeastern U.S., two incidents were reported in which mixer/loader/applicators (M/L/As) pouring endosulfan without proper protective equipment experienced serious illnesses (Brandt et al., 2001). In both cases, endosulfan splashed onto skin and clothing during mixing and loading; in the second case, drift during the application, enough that his clothes "appeared soaked," was witnessed. Both individuals proceeded with the applications without washing skin or changing the contaminated clothing. Exposure durations were estimated at 4 -

5 hours. Evidence suggested that these exposures resulted in long-term neurological damage in one case, and in death in the other case.

OEHHA COMMENT: Page nine, last paragraph. Where it is stated that, “no endosulfan residues have been detected in drinking water in California in the past three years for which data are available,” recommend adding the approximate (or exact) number of samples upon which this statement is based.

DPR RESPONSE: The comment at the top of page 4, first paragraph, regarding drinking water. DPR can provide the additional data. Three years of drinking water data from California were sampled by the USDA-PDP program between 2001-2003 (USDA, 2003, 2004, 2005). A total of 424 California water samples were analyzed with a limit of detection of 0.1 ppb or better. No endosulfan or endosulfan degradates were detected.

This information was added: California drinking water data (3 years) from between 2001-2003 were examined by the USDA-PDP (USDA, 2003, 2004, 2005). A total of 424 California water samples were analyzed with a limit of detection of 0.1 ppb or better. No endosulfan or endosulfan degradates were detected. The number of samples by year were: 2001; 144, 2002; 140, and 2003; 140. The samples were collected from municipal water processing facilities post-processing and ready to drink. These results suggest that drinking water systems in California are not likely to be a source of human exposure to endosulfan.

OEHHA COMMENT: Page 11, second paragraph. “In California, endosulfan has been monitored and detected in 34/39 or 23/39 samples by 8 hours after application for the alpha- and beta-isomers, respectively.” Recommend adding where this air sampling was performed. For example, were these samples taken in the fields, or in towns miles away from the fields?

DPR RESPONSE: See Appendix A, Table 14 for a summary of endosulfan concentrations and locations of monitoring stations; Beauvais, 2007.

OEHHA COMMENT: Page 12, last paragraph. Recommend explaining what is meant by endosulfan being bioconcentrated 5.2 times but having a bioconcentration factor of 37.5 (for example).

DPR RESPONSE: The paragraph has been changed to the following:

Endosulfan is also bioconcentrated in 2 strains of fish (*Labeo rohita* & *Channa punctata*) that were treated with α - and β -endosulfan at 0, 0.1414 and 0.2274 ug/l for one month (Ramaneswari and Rao, 2000). Tissue analyses showed that the isomers of endosulfan persisted in the fish. Both the α - and β -isomers were persistent in both strains of fish, with α -occurring at higher concentration. In *L. rohita*, the α - form was bioconcentrated 5.2 times and had a bioconcentration factor (relative uptake of endosulfan from it's medium by the organisms) of 37.5. The β -form was bioconcentrated 7.7, with a bioconcentration factor of 55.4. In *C. punctata*, the α - form bioconcentration was 1.8 times and had a bioconcentration factor of 13.2 and the β -form bioconcentration was 11.8, with a bioconcentration factor of 13.4.

Endosulfan sulfate was found as a metabolite in *L. rohita* only (bioconcentration = 0.54; no bioconcentration factors were reported).

OEHHA COMMENT: Page 16, third paragraph. It is not clear why the percent total absorption (47.3 percent) was calculated using the percent absorption at the two lowest dose levels, rather than just the percent absorption at the lowest dose level (the lowest dose level showed the greatest absorption at 24 hours). Since the value of 47.3 percent is used by the Worker Health and Safety Branch to calculate occupational exposures, we recommend this be explained.

WH & S RESPONSE: The mean 168-hour absorption of the two lowest doses was used, rather than the absorption of the lowest dose, because at 168 hours the greatest absorption was associated with the mid-level dose, not the lowest dose - but the percent absorption was nearly the same for both doses (see Table 6 in the EAD). Although greater penetration was documented in the lowest dose than in the other doses at 24 hours, at that point there were extensive bound skin residues. Had the 24-hour low-dose results been used, all of the bound skin residues would have been included in the absorbed dose estimate (because we anticipate that some portion would be absorbed), resulting in an estimated 63.5% dermal absorption value (22.1% penetrated + 41.4% bound to skin). As we have data at 7 days (168 hours) showing that the total residues that were penetrated and bound to skin is just under 50% ($44.8\% + 1.7\% = 46.5\%$), using the 24-hour value would give an inappropriate overestimate of dermal absorption. To clarify in the EAD, the text before Table 6 was revised as follows:

Craine (1988) reported that amounts of ^{14}C -endosulfan recovered from the application site decreased over time, while amounts of residues in excreta increased. These trends suggest that residues bound to skin are bioavailable. For example, at 24 hrs in the low dose animals, the residues in the skin represented 41.4% of the applied dose; residues declined to 23.8% and 7.0%, respectively, at the 48-and 72-hr sacrifice time periods. Similar declines in bound skin residues occurred at the two higher treatment levels.

A portion of the bound skin residues recovered in any dermal absorption study are expected to be absorbed; as the amount that will be absorbed is unknown, standard practice is to include bound skin residues in estimates of absorbed dose (U.S. EPA, 1998c). The results from 168 hours post-dose suggest that much of the residues in the skin at 24 hours were not absorbed. Because of the large amount of residue bound to skin at 24 hours, dermal absorption can be more accurately estimated using data from 168 hours post-dose (Table 6). DPR selected the mean dermal penetration of the two lowest doses (47.3%) to estimate absorbed dosages, as the lowest doses approximate levels of endosulfan exposure experienced by handlers and fieldworkers. Total recoveries of administered doses averaged above 90%, precluding any need to adjust the estimated dermal absorption for absorbed dose recovery.

A new reference (U.S. EPA, 1998c) was added, cited in the newly added text:

U.S. EPA. 1998c. Health Effects Test Guidelines. Health Effects Test Guidelines: Dermal Penetration (OPPTS 870.7600). Washington, DC: Office of Prevention, Pesticides and Toxic Substances, U.S. Environmental Protection Agency.

http://www.epa.gov/opptsfrs/publications/OPPTS_Harmonized/870_Health_Effects_Test_Guidelines/Series/870-7600.pdf

OEHHA COMMENT: For Table 3, recommend specifying whether the values are means.

DPR RESPONSE: The correction was added (“means”).

OEHHA COMMENT: On page 31 is a discussion of a rat subchronic dietary study. The text’s characterization of the data in Table 3 contains a number of inaccuracies. Recommend correcting. In addition, there were decreases in red blood cells (RBCs) and hemoglobin at 1.92 mg/kg-day, and microscopic alterations to the kidneys at 0.64 and 1.92 mg/kg-day, which might be used to argue for a lower NOEL than that designated in the draft RCD for this study (1.92 mg/kg-day). Thus, the absence of these effects in the rat chronic dietary study (Table 5) is noteworthy. OEHHA recommends noting this in the discussion of the subchronic study.

DPR RESPONSE: The corrections were made in the discussion as follows:

Microscopically, livers showed granular brown pigment in males and centrilobular enlargement of hepatocytes at 23.41 mg/kg/day for males and 27.17 mg/kg/day for females. In kidneys, discoloration (pigmentation) was increased primarily at 3.85 mg/kg/day and greater in males and for females, 4.59 mg/kg/day and greater but it was reduced to trace amounts or was completely reversed after the 4-week recovery. Granular/clumped pigment remained in males after recovery. Both the discoloration and the granular/clumped pigments continued after treatment, it did not seem to have any toxicological effect.

RBCs were statistically significantly decreased in males (≥ 1.92 mg/kg/day, week 6; ≥ 3.85 mg/kg/day, week 13 and at 23.41 mg/kg/day week 17 recovery). In females RBCs were statistically significantly decreased (≥ 4.59 mg/kg/day, week 6; 27.17 mg/kg/day, week 13, reversed at week 17 recovery). In males hemoglobin (Hb) was statistically significantly decreased (≥ 1.92 mg/kg/day week 6; 23.41 mg/kg/day week 13; ≥ 3.85 mg/kg/day at recovery). In females Hb was decreased (≥ 4.59 mg/kg/day, week 6; ≥ 0.75 mg/kg/day—not dose related, week 13; reversed at recovery).

A note that these effects to RBCs, Hb, and kidney (granular/clumped pigments and discolored pigment) were not observed in the chronic rat study was added to the Hazard ID section.

OEHHA COMMENT: Page 33, bottom paragraph. It is mentioned that the animals exhibited hyperexcitability, tremor, dyspnea and salivation at all dose levels. However, the mid-dose level was chosen as the NOEL in both cases (male and female). Recommend explaining why the clinical signs at the lowest dose level were not used to set the LOEL.

DPR RESPONSE: Results at all doses showed hyperexcitability, tremor, dyspnea and salivation that disappeared after 3-4 days. These effects were considered transitional and therefore were not used to establish a LOEL.

OEHHA COMMENT: Page 35, second paragraph. The systemic NOEL was based on cholinesterase (ChE) activity. Thus, it is not clear why it is different from the ChE NOEL. Recommend clarifying.

DPR RESPONSE: The systemic NOEL was 3 mg/kg/day based on an increase in mortality, lung and cardiovascular effects. The ChE NOEL was less than 1 mg/kg/day, based on a significant decrease in serum ChE activity in both sexes (M: 72 - 79% in males at 9 mg/kg/day or greater; F: 19 - 38% at 9 mg/kg/day or greater) and in brain ChE activity (M: 6 - 28% at 3 mg/kg/day or greater; F: 14 - 18% at 1 mg/kg/day or greater).

OEHHA COMMENT: Page 35, second and third paragraphs. In a dermal study reported by Ebert et al. (1985b) brain ChE activity of male Wistar rats was not significantly decreased at 12 and 48 mg/kg-day. However, significant reduction in brain ChE activity was reported in male Wistar rats in a similar study at doses as low as 3 mg/kg-day (Ebert et al., 1985a). Recommend discussing the possible reason(s) for this discrepancy.

DPR RESPONSE: It was explained in the study summary why the results of the first study were not acceptable. Ebert et al. (1985a) was not acceptable according to FIFRA Guidelines since it was reported that the endosulfan administration method caused some of the deaths at all doses, dosing material was not characterized and complete histopathological examination was not performed. The subsequent study from the same laboratory was performed with revised treatment methods (see below, Ebert et al., 1985b).

Both studies were performed in the same laboratory and the Ebert et al., 1985b was supposed to be a repeat of 1985a, only with corrections to the dosing methods and differences in doses. However the dosing material was not characterized in either experiment, and there was incomplete histopathology. Therefore, these studies are considered to be supplemental.

OEHHA COMMENT: Page 36, first paragraph. It is stated that at 80 mg/kg/day, the females exhibited both a 28 percent decrease in serum ChE and a 24 percent decrease. Recommend correcting since both cannot be true.

DPR RESPONSE: Changes have been made to now read:

Males had statistically significantly decreased serum ChE at 640 mg/kg/day (-13%) and in females it was decreased at 80 mg/kg/day (-28%) and 160 mg/kg/day (-46%) when measured one day following the last dosing. Brain ChE in males was decreased 15% at 640 mg/kg/day. No ChE effects were observed in males at recovery. Females showed statistically significant decreases in serum ChE at 80 mg/kg/day (-24%) and at 160 mg/kg/day (-23%) when tested 23 days after the last dose.

OEHHA COMMENT: Page 38, last paragraph. "There was a non-dose related increase in glomerulonephritis in males at ≥ 0.4 mg/kg/day." This dose level does not correspond to any of the male dose levels listed in the text at the top of the paragraph or listed in Table 5. Recommend correcting.

DPR RESPONSE: Corrected

OEHHA COMMENT: Table 5. The female dose level of 0.5 mg/kg/day does not correspond to any dose level discussed in the text. Recommend correcting.

DPR RESPONSE: Corrected

OEHHA COMMENT: Table 5. Glomerulonephrosis is mentioned under footnote ^d, cited in the blood vessel section of the table. It is not clear why it is mentioned here rather than under a footnote linked to the kidney section of the table. Also, recommend showing in the table the incidences of glomerulonephrosis at the different dose levels.

DPR RESPONSE: Footnote corrected and incidences of glomerulonephrosis added for all animals treated.

OEHHA COMMENT: Page 40, second paragraph. “The chronic NOEL was 0.84 (males) and 0.98 (females) mg/kg/day, based on increased mortality in the main group of females at 2.8 mg/kg/day.” The publication in Food and Chemical Toxicology states that the male NOEL of 0.84 was based on decreased bodyweights in males at the next highest dose level. Recommend checking to be sure the RCD is correct.

DPR RESPONSE: Corrected as follows:

Bodyweight gain was statistically significantly decreased in males at 2.48 mg/kg/day, however the reduction was only 5% and therefore not considered to be a noteworthy effect.

OEHHA COMMENT: Page 44, second paragraph. Recommend stating the values for the increased chromosomal aberrations and abnormal metaphases in spermatocytes from dosed animals.

DPR RESPONSE: The following information was added:

Swiss male mice (8/dose) were gavaged with endosulfan (purity not stated) at 0 (distilled water), 22, 32 and 42 mg/kg/day for 5 days to examine the effect on chromosomal breakage in germ cells (Usha Rani and Reddy, 1986). Then, 60 days post-treatment, the mice were terminated and the testes were dissected out. One hundred spermatocytes were examined per mouse for structural and numerical chromosomal abnormalities at the diakinesis first metaphase stage of meiosis. To assess the significance of differences in the frequency of chromosomal abnormalities between control and treated groups the data were subjected to the Chi-squared test. Administration of endosulfan resulted in increased frequency of chromosomal aberrations and abnormal metaphases in spermatocytes (presumed to have been spermatogonia at the time of treatment) at all doses (Table 7). This effect was not observed in previous studies performed in rats (Dikshith and Datta, 1977). This study was not acceptable according to FIFRA Guidelines.

Table 7. Chromosome aberrations in Mice Induced by Different Doses of Endosulfan

Effect Observed	Dose of Endosulfan (mg/kg/day)			
	0	22	32	42
# Metaphases Scored	800	800	800	800
# Abnormal Metaphases ^a	96 (12)	106 (13.2)	148 (18.5)	172 (21.5)
# Polyploids	24 (3.0)	30 (3.8)	37 (4.6)*	52 (6.5)**
# Aneuploids(19 II) ^b	3 (0.4)	6 (0.8)*	10 (1.3)*	7 (2.1)**
# Autosomal Equivalents (19 II 1 + 1)	30 (3.8)	31 (3.9)	44 (5.5)*	46 (5.8)*
# Univalents (19 II x+y)	39 (4.9)	36 (4.5)	56 (6.8)**	51 (6.5)**
Translocations	--	3 (0.4)*	--	5 (0.6)*

a Numbers in parenthesis indicate percentage.

b II = Bivalents.

*, ** - p < 0.05 and 0.01, respectively. The following information was added:

Results showed after endosulfan treatment, the number of chromosome breaks was less in bone marrow and was absent in spermatogonial cells, compared to controls (% comparison). Metaphases in both bone marrow cells (11.88 at 11.6 mg/kg/day, 25.45 for control; p < 0.001) and spermatogonial cells (8.75 at 11.6 mg/kg/day, 11.81 for control; p < 0.05) were significantly decreased.

OEHHA COMMENT: Page 44, fourth paragraph. Recommend providing values for the increases in chromosomal aberrations reported in these two studies.

DPR RESPONSE: The studies in question performed with human subjects (Rupa et al., 1989a and 1989b) were actually performed with pesticide mixtures (one of which was endosulfan). No doses of any of the pesticides were stated and no aspects of the studies were performed with endosulfan alone. Therefore, since this information was not relevant to this RCD, these two studies were removed from the document.

OEHHA COMMENT: Page 44, last paragraph. “human lymphoid cells of the LAZ-007 cell line were incubated with 10⁻⁴, 10⁻⁵ and 10⁻⁶M endosulfan technical (0.41, 4.1, 41 ug/ml), respectively.” The orders are reversed, recommend correcting.

DPR RESPONSE: They were corrected.

OEHHA COMMENT: Page 45, second and last paragraphs. Recommend providing values to indicate quantitatively the magnitudes of increases in these endpoints due to the test article.

DPR RESPONSE: The following was added and changed.

To assess genetic damage produced by endosulfan in germ cells of eukaryotic organisms, induction of sex-linked recessive lethals (SLRL) and sex-chromosome loss (SCL) by endosulfan was tested in *Drosophila melanogaster* (Velazquez et al., 1984). Endosulfan (50% a.i./50% kaolin in dispersing + wetting agents), dissolved in DMSO and diluted with 5% sucrose solution, was fed to first instar *Berlin-K* wild type male larvae at 0, 50 and 100 ppm until the flies had grown to adults. For adult treatment, 2-3 day old males were starved for 4 hours then fed the test solution in glass filter feeding units for 48 hours at 0, 150 and 200 ppm. The SLRL Test: 4-5 day old *Berlin-k* males treated as larvae (0, 50 and 100 ppm) and as adults (0, 150 and 200 ppm) were crossed individually with three 3-4 day old *Basc* virgin females for 3 days. The sensitivity of the germ cell stages of the males treated as adults was determined using a 3-2-2 mating scheme (broods), followed by transferring the males to fresh virgin females. The progeny of individual P males were identified so that clusters of lethals could be detected. The SCL test: 3-4 day old *Ring-X* males (treated for 24 hours at 0, 50, 100 and 200 ppm) were mass-mated in bottles to 3-4 day old *y sp* virgin females in a ratio of 2 females per male for 3 days followed by two 2-day successive broods. The F1 offspring were scored and the exceptional phenotypes were noted. Results showed a statistically significant increase in percent lethals (SLRL) in the offspring of males treated at 100 ppm as larvae (# lethals/# chromosomes tested at 0 = 7/4527; 0.15% lethals and at 100 ppm = 10/1270; 0.79%; $p < 0.05$; Kastenbaum and Bowman test). SLRL results in male germ cells exposed to endosulfan for 48 hours showed the number of lethals/number of chromosomes tested (%) were statistically significantly increased ($p < 0.05$; Kastenbaum and Bowman test) at 200 ppm in Brood 1 (3 days; 12/1034 (1.16%)), Brood 2 (14/974 (1.44%)), Brood 3 (11/946 (1.16%)) and in the total of all broods (37/2954 (1.25%)). SCL results with *Ring-X* adult males, treated at 0, 50, 100 and 200 ppm showed a statistical increase in F1 offspring were scored for exceptional phenotypes, or SCL. For the pooled data (3 broods) the chi-square test showed that all doses yielded a similar and significant increase of entire SCL (# XO males at 0 = 26/4416, 0.59%; 50 = 243/23142, 1.05%; 100 = 212/23536, 0.09% and 200 = 50/5858, 0.92%). Partial Y chromosome losses were not detected. There was no dose-related effect. The results suggest a more pronounced clastogenic effect in sperm, since the increase in frequency of XO exceptional offspring was significant in brood 1 at all 3 concentrations tested. Endosulfan was considered in the report to be an efficient mutagen in *Drosophila*. This study was not acceptable under current FIFRA Guidelines.

OEHHA COMMENT: Page 53, last paragraph. According to the data presented in Table 7 (changed to Table 8), the maternal NOEL was 0.66 mg/kg/day (based on decreased corrected bodyweight change), not 2 mg/kg/day as stated in the text and in Table 10. Recommend correcting. Also, the skeletal anomalies supporting the developmental NOEL of 2.0 mg/kg/day occurred at > 2 mg/kg/day, not ≥ 2 mg/kg/day as stated in the text. Recommend correcting.

DPR RESPONSE: The following corrections and additions were made:

The maternal NOEL of 2 mg/kg/day was based on significantly decreased mean body weight change (GD 0 to 20; -33%; corrected = -40%), decreased absolute body weight (GD 20 = -13%; corrected = -13%) and increased clinical signs such as face rubbing (20/28) and lethargy (2/28) at 6 mg/kg/day (Table 8; formerly Table 7). While there was a 14% decrease in body weight gain (corrected) on GD 20, this effect has no toxicological significance because the

corrected body weight gain is derived from at least three calculations where there is ample room for error. Additionally, there were no other statistically significant effects that were noteworthy at this dose, so this effect was not considered to be sufficient to establish a lower NOEL than 2.0 mg/kg/day. The developmental NOEL was 2 mg/kg/day, based on decreased mean fetal weights (8%), and increased growth retardation and developmental skeletal anomalies (sternebrae: small #4 and unossified) at 6.0 mg/kg/day. While misaligned sternebrae number 4 was statistically significantly increased at 0.66 and 2.0 mg/kg/day (Table 8; formerly Table 7), it was not at 6.0 mg/kg/day.

Table 8. Developmental Effects Observed in Fetal Rats^a

Observations	Treatment Level (mg/kg/day)			
	0	0.66	2.0	6.0
DAM EFFECTS				
Number Dams on Study at Initiation of Dosing	30	25	25	35
Number of Dams on Study Day 20 of Gestation	29	25	25	28
Number of Dams with Implants	28	23	25	27
Number of Litters with Live Fetuses	28	23	25	27
Number of Deaths	1	0	0	7
Mean Weight (g) Gravid Uterine (# Weighed)	85 (28)	85 (23)	86 (25)	78 (27)
Mean GD 20 Body Weight (g) ^b (% decrease)	428	419	416	376** (-12%) ^{e, f}
Mean Weight Gain (g) – GD 0 to 20 ^b (% decrease)	160	155	151	108** (-33%) ^f
Corrected Body Weight (g) -- GD 20 ^{c, b} (% decrease)	343	335	330* (-1%) ^{e, f}	298** ^e (-13%) ^{e, f}
Corrected Body Weight Gain (g) --GD 20 ^d	75	70	64* (-14%) ^f	30* (-40%) ^f
FETAL EFFECTS:				
Percent Live Fetuses	97.2	96.4	91.0*	97.2
Number of Resorbed Fetuses per Litter	0.4	0.5	1.4*	0.3
Percent Resorbed Fetuses	2.8	5.2	8.5*	2.2
Mean Fetal Weight	3.8	4.0	3.9	3.5**
Mean Fetal Length (cm)	3.8	3.9	3.9	3.7*
Number of Litters with DEVELOPMENTAL ABNORMALITIES:				
Small 4th Sternebrae (% litters affected)	10 (45.5)	11 (50)	5 (20)	22 (84.6)*
Unossified 5th Sternebrae (% litters affected)	9 (41)	12 (54.5)	10 (42)	22 (84.6)**
Misaligned Sternebrae # 4 (% litters affected)	0	8 (36.4)*	8 (33)*	7 (27)*

*, ** - Significantly different from control at p < 0.05, 0.01, respectively.

a - Fung, 1980b

b – Mean weights (grams) were calculated only for dams that were pregnant at C-section on GD 20.

c – Weight on GD 20 minus gravid uterine weight.

d – (GD 20 body weight) - (gravid uterine weight)

e – Parentheses = % decrease in body weights or % decrease in body weight gain.

f – Percent decrease of body weights were calculated using the mean body weights only for dams pregnant at C-section.

OEHHA COMMENT: Page 66, Table 10 (currently Table 11). The inhalation LOEL should be corrected to read 0.567 rather than 0.0036.

DPR RESPONSE: Corrected

OEHHA COMMENT: Page 66, second paragraph. Here the decision is made to use the NOEL from the developmental study in rabbits (0.7 mg/kg/day) to “calculate margins of exposure for potential acute single-day human exposures to endosulfan.” OEHHA agrees that this NOEL should be used for oral exposures in the human, but disagrees with using it for short-term inhalation exposures, since the inhalation route is much more sensitive than the oral route (see Table 11). Rather, OEHHA recommends using the subchronic inhalation study in the rat (NOEL = 0.194 mg/kg/day) for short-term human exposures via inhalation.

DPR RESPONSE: This entire section was changed in order to use the acceptable inhalation study for acute inhalation NOEL.

OEHHA COMMENT: Page 67, fourth paragraph. “There were no FIFRA Guideline acceptable studies for subchronic dermal exposure.” Recommend correcting, since two such studies are available (discussed on pages 35-36 of the RCD). Since most worker exposure is via the dermal route, this also raises the issue of why Seasonal Average Daily Dosage (SADD) MOEs (Tables 35-37; currently Tables 36-38) were calculated using a subchronic oral NOEL, rather than a NOEL from one of these subchronic dermal studies. Recommend providing justification for using a NOEL from an oral study to calculate the dermal MOEs.

DPR RESPONSE: This entire section was changed to reflect the suggestions and also because of new information issued by USEPA (USEPA, 2007. (Wilber, D., Reaves, E., and Recore, S., January 31, 2007). **MEMORANDUM: Endosulfan.** The Health Effects Division’s Review of California’s Endosulfan Risk Characterization Draft Document (dated 12/05/2006); Reregistration Branch II; Health Effects Division (7509P), Office of Prevention, Pesticides and Toxic Substances, United States Environmental Protection Agency, Washington, DC.

OEHHA COMMENT: Table 12 (currently Table 13). The table and text on page 68 indicate that the dogs were dosed via capsule, but the text on page 41 and the “Summary of Toxicology Data” in the Appendix indicate that the test article was fed in the diet. Recommend correcting.

DPR RESPONSE: This was corrected.

OEHHA COMMENT: Page 69, top paragraph. Here the choice is made to use the chronic dog feeding study NOEL of 0.57 mg/kg/day in calculating the non-occupational, chronic inhalation risk. However, the inhalation route is clearly more sensitive than the oral route, as illustrated by the 6- to 10-fold lower subchronic NOEL for rats dosed via inhalation compared to via the diet (formerly Table 11; currently Table 12). Thus, as discussed above, OEHHA recommends using the subchronic rat inhalation study to estimate chronic inhalation risks to bystanders (including “ambient”) and workers.

DPR RESPONSE: This entire section was changed to reflect OEHHA suggestions.

OEHHA COMMENT: Page 75, third paragraph. Recommend adding PPE to the Abbreviations list.

DPR RESPONSE: This was done.

OEHHA COMMENT: Table 18 (currently Table 19). Recommend adding footnote ^g.

DPR RESPONSE: This was done.

OEHHA COMMENT: Table 19 (currently Table 20). Recommend adding footnote ^f.

DPR RESPONSE: This was done.

OEHHA COMMENT: Page 82, second paragraph. Recommend adding REI and PHI to the abbreviations list.

DPR RESPONSE: That was done.

OEHHA COMMENT: Page 87, second paragraph. The U.S. EPA draft 2002 Reregistration Eligibility Decision (RED) for endosulfan calculated acceptable MOEs for acute and chronic dietary exposures. Since the draft RCD used a similar methodology for dietary exposure assessment, this is cited as justification for not performing a dietary exposure assessment using more recent pesticide residue and food consumption databases. However, the U.S. EPA selected a higher critical acute NOEL (1.5 mg/kg-day, Formerly Table 42; currently Table 43). Were the U.S. EPA to use the lower acute NOEL selected in the draft RCD (0.7 mg/kg-day), some MOEs might be unacceptable. In addition, the U.S. EPA draft 2002 RED for endosulfan used the 1989-92 CSFII food consumption database, not the most recent 1994-98 CSFII database. Therefore, OEHHA recommends not citing the U.S. EPA draft 2002 RED for endosulfan as support for the sufficiency of the RCD's dietary exposure assessment.

DPR RESPONSE: The comment at the top of page 7, first paragraph, regarding the U.S. EPA draft 2002 RED. The U.S. EPA and DPR endosulfan dietary exposure assessments used the same 1989-92 CSFII consumption database. This makes dietary comparisons between the 2 documents relevant. The 1998 DPR dietary exposure assessment used a NOEL of 0.7 mg/kg-day and the 1989-92 CSFII database, that resulted in acute MOEs of 212 or higher. It is likely that a revised U.S. EPA assessment using the lower acute DPR NOEL value would still not result in MOEs below 100. This assumption is based on the combination of decreased use of endosulfan nationally, newly cancelled or revoked tolerances, and residues derived from the USDA PDP (not DPR) monitoring program. The U.S. EPA reached a similar conclusion in a January 2007 memo (U.S. EPA, 2007). Therefore, DPR believes it is appropriate to cite the 2002 U.S. EPA document.

OEHHA COMMENT: Page 87, second paragraph. Should read Appendix C rather than Appendix D.

DPR RESPONSE: Changed.

OEHHA COMMENT: Page 87, third paragraph. It is stated that endosulfan use data from 1998 were the most recent. However, at the end of the paragraph it is stated that endosulfan use remained stable from 1992-2001. Recommend harmonizing these apparently contradictory statements.

DPR RESPONSE: The statement was changed to read: Overall, national endosulfan use remained fairly stable during the 1992-2001 period for the above commodities examined individually for individual years. The 1998 data were the most recent “multi-year” data available.

OEHHA COMMENT: Table 23 (currently Table 24). Recommend explaining what “ac=high#” means. Also recommend explaining what is meant by footnote ^c.

DPR RESPONSE: Comment middle of page 7, beginning with ■Table 24. • *Ac=high#* means acute value = highest residue. This change will be made.

OEHHA COMMENT: Page 90, third paragraph. Recommend explaining what is meant by a “non-systemic pesticide.”

DPR RESPONSE: Explanation added: (those that stay only on the surface of the plant),

OEHHA COMMENT: Page 91, top paragraph. Should read Table 23 (currently Table 24) instead of Table 24.

DPR RESPONSE: Changed.

OEHHA COMMENT: Table 24 (currently Table 25) compares maximum endosulfan residue values in the older DPR monitoring program to those collected by the more recent Pesticide Data Program (PDP) monitoring program. Since average pesticide residue values are used by DPR for chronic dietary exposure assessments, recommend that a similar comparison also be made in Table 24 for the average endosulfan residue values. Also recommend adding apple, potato and tomato since these are the crops treated with the highest levels of endosulfan. (page 101).

DPR RESPONSE: Comment top of page 8, 1st paragraph. Originally, both text and tabular explanation existed. Text alone was considered the optimal presentation method. Since measures of central tendency are being used to define the comparisons, it would not be appropriate to add measurements at the 95th percentile.

OEHHA COMMENT: Page 94. The last paragraph is repeated.

DPR RESPONSE: Changed.

OEHHA COMMENT: Page 101, first paragraph. “The differences between the 2 surveys’ consumption rates ranged from a 63% decrease in tomato consumption by nursing infants from

the 1989-92 group levels to a 71% increase in potato consumption by non-nursing infants relative to the 1989-92 rates.” On the following page the increase is given as 77 percent. Recommend correcting.

DPR RESPONSE: Corrected to 71%

OEHHA COMMENT: Page 102, paragraph 5. “The percent user day rate is the ratio of actual consumers divided by per capita consumption for each community.” This definition is unclear. Recommend using the definition given in Table 25 (currently Table 26) in footnote ¹. However, that footnote should be corrected to read A Percent User Day Rate.

DPR RESPONSE: The definition of user day is found in Section VI Consumption Databases of the Endosulfan Dietary Exposure Addendum

OEHHA COMMENT: Pages 101 and 102, apple, pear, potato, tomato. Recommend showing the data for mean consumption rates in a table. Also recommend adding the 95th percentile consumption rates. Also recommend stating which values are based on users only and which values are based on all members of each population subgroup (users + nonusers).

DPR RESPONSE: The mean consumption values presented in Section VI Consumption Databases represent user day (active consumers) and not *per capita* consumption. The last paragraph in Section VI Consumption Databases of the Endosulfan Dietary Exposure Addendum contains a discussion of user day versus *per capita* consumption.

OEHHA COMMENT: Page 103, top paragraph. “The Exposure-1TM program estimates the annualized average exposure for all members of a designated population subgroup (TAS, 1996b).” Recommend discussing why the chronic dietary analysis is based on the entire population of each subgroup while the acute analysis is based only on the users in each population subgroup.

DPR RESPONSE: The rationale for this process is that an alternative to conducting seasonal exposure analysis is to closely examine both the acute and chronic dietary exposures for the possibility of using them as bounding range for the seasonal exposure. In a subchronic exposure scenario, individuals in a population subgroup could potentially have higher than chronic (average) exposure depending on the consumption pattern and residues on the seasonal commodities. The overall exposure for the group is, however, expected to be closer to the chronic than acute exposure because it is highly unlikely that individuals would consume commodities containing residue levels at the highest detected residues for the entire season. On the other hand, the exposure for a shorter-term (*e.g.*, 2-week) can be closer to the acute than the chronic exposure especially if the same or similar batch of food could be consumed over this period of time.

OEHHA COMMENT: Page 104, last sentence in paragraph two. Table 27 (currently Table 28) should be corrected to read Table 26.

DPR RESPONSE: Corrected.

OEHHA COMMENT: Table 26 (currently Table 27). Recommend adding the proper units to the table: µg/kg/day.

DPR RESPONSE: Corrected.

OEHHA COMMENT: Table 27 (currently Table 28). In footnote ^c the term “24-hour TWA” is used while in the table under “Air concentration” the term “Short-term” is used. In footnote ^d the term “3-day TWA” is used while in the table under “Air concentration” the term “Long-term” is used. Recommend being consistent in the use of the terminology in order to make this table more easily understood.

WH & S Response: The footnote equation terms in Table 23 of the EAD (analogous to Table 28 in the RCD; formerly Table 27) were changed to "short-term concentration" and "long-term concentration," respectively. The equation in footnote c now is: Short-Term Absorbed Daily Dosage (mg/kg/day) = (short-term concentration) x (inhalation rate).

OEHHA COMMENT: Page 106, second paragraph. States that the data in Table 28 (currently Table 29) were for the period 1990 to 2000. However, Table 28 states that sampling was through July 1996. Recommend correcting.

WH & S RESPONSE: Table 29 in the RCD is analogous to Table 15 in the EAD. To clarify any confusion resulting from the table title and text mentioning 1996, Sheryl Beauvais changed the text as follows: Historically, endosulfan has been detected numerous times in California surface waters. Guo and Spurlock (2000) summarized historical monitoring data, reported by nine different agencies between 1990 and July 2000, for pesticides in surface water in California. Monitoring for α-endosulfan, β-endosulfan, and endosulfan sulfate was conducted between August 1990 and July 1996; no monitoring has been reported since 1996 (DPR, 2004).

Table 15's title is now: Summary of Historical Surface Water Sampling Data for Endosulfan in California Through July 2000 and footnote a in Table 15 was changed to the following: Adapted from Guo and Spurlock. (2000), which summarizes water sampling conducted between August 1990 and July 2000. However, no monitoring for endosulfan has been reported since July 1996 (DPR, 2004), nor does the database differentiate between surface water systems that are sources of drinking water and those that are not (F. Spurlock, personal communication, June 7, 2005).

OEHHA COMMENT: Page 110, first paragraph. 40/89 does not equal 55%. Also, it is not obvious to this reviewer where the values 51%, 41%, 22% and 60%, 30%, 80% come from. Recommend discussing.

DPR RESPONSE: The entire section was changed to the following:

...in more than half of all combined occupational exposure scenarios (acute, subchronic, chronic), the dietary component comprised less than 3% (49/89 = 55%) of the combined exposure (data in **bold** currently Tables 31 - 33). The majority of the combined occupational

exposures where diet comprised a higher percentage (3% or greater) was observed for STADD (18/35; 51%) and AADD (16/27; 59%). SADD total occupational combined exposures with a dietary component of greater than 2% was 6/27, or less than half the number for the other scenarios. The highest percentages for dietary contribution of combined occupational exposure were re-entry scenarios where STADD was 60% (9/15), SADD was 30% (3/10) and AADD was 80% (8/10) (data in **bold** currently Table 33).

OEHHA COMMENT: Table 39 (currently Table 40). Recommend using the rat two-generation dietary study (with a NOEL of 1.18 mg/kg/day) rather than the subchronic rat inhalation study (NOEL = 0.194 mg/kg/day) for calculating the non-dietary MOEs in this table. This is because the non-dietary exposures are via the oral route, not the inhalation route.

DPR RESPONSE: This was an error and has been changed.

OEHHA COMMENT: Page 118, second paragraph. This paragraph discusses subchronic dietary MOEs but no subchronic MOEs are in Table 40 (currently Table 41). Recommend adding the subchronic MOEs to the table.

DPR RESPONSE: This information was in the text above the table.

There were, however no subchronic (seasonal) dietary exposure data for endosulfan, therefore chronic dietary exposure data were used as a default.

OEHHA COMMENT: Page 118, last paragraph. “There were no percent crop treated (%CT) adjustments used in these calculations.” Footnote ^d in Table 40 (currently Table 41) contradicts this statement. Recommend correcting.

DPR RESPONSE: Changed.

OEHHA COMMENT: Page 119. Regarding the formula for calculating combined margins of exposure, recommend presenting the rationale for combining exposure dosages from the oral and inhalation routes given the lower NOEL associated with the inhalation route. Lacking a rationale for doing this, OEHHA recommends calculating separate MOEs for the two routes, and then combining the results as performed in the DPR document “Methyl Bromide RCD Volume III Aggregate Exposure” dated October 24, 2002.

DPR RESPONSE: OEHHA recommendations were followed. When two or more routes were used, an aggregate exposure was calculated. This impacted scenarios where dermal, inhalation and dietary and where inhalation and dietary routes were combined (aggregate exposure: currently Tables: 36, 37, and 39) as performed in DPR document “Methyl Bromide RCD Volume III Aggregate Exposure” dated October 24, 2002. The calculations were included in the RISK CHARACTERIZATION section of V. RISK APPRAISAL and within the tables.

OEHHA COMMENT: Table 40 (currently Table 41). The acute child MOE of 212 and the acute infant MOE of 220 are relatively close to 100. This suggests that re-analysis using the

more recent pesticide residue data and food consumption data is warranted. Same comment for Bystander Infants with a combined MOE of 158 in Table 38.

DPR RESPONSE: Comment top of page 8, 2nd paragraph. The acute dietary MOEs are all 212 or higher. The default threshold MOE when a NOEL is derived from an animal study is 100. The acute MOEs range between 2.12 - 5.5 fold higher than the generally accepted 100. Based on this MOE range, a re-analysis is not necessary.

OEHHA COMMENT: Page 122, second paragraph. As discussed above, OEHHA recommends using the rat subchronic inhalation study for inhalation exposures, including acute. Given that the rat subchronic inhalation LOEL was 10-fold lower than the rat subchronic oral LOEL (0.3873 versus 3.85), we believe the use of an acute oral NOEL for acute inhalation exposures would underestimate the risk. The more health-protective approach is to use the subchronic inhalation NOEL.

DPR RESPONSE: The acceptable rat subchronic inhalation study was used for acute, subchronic and chronic inhalation exposures as suggested (with an adjustment factor for chronic).

OEHHA COMMENT: Page 141, last paragraph. It is not clear from this paragraph whether the dietary risk discussed here is based on a dietary assessment as shown in Table 40 (currently Table 41), or a tolerance assessment as shown in Table 43 (currently Table 44). Recommend clarifying.

DPR RESPONSE: The dietary risk discussed refers to the information in Table 43. The following was added: The dietary risk is determined after examining MOEs for individual commodities as shown in Table 43.

OEHHA COMMENT: Page 148, second paragraph. “The resulting equivalent acute human inhalation NOEL was 0.7 mg/kg assuming a default respiratory rate of 0.59 m³/kg/day for children.” Should be corrected to read 1.2 mg/kg rather than 0.7 mg/kg.

DPR RESPONSE: Corrected.

OEHHA COMMENT: Pages 148-149. As stated above, OEHHA recommends using the subchronic rat inhalation study result for calculating all inhalation MOEs, including acute, subchronic and chronic.

DPR RESPONSE: Suggestion followed.

OEHHA COMMENT: Page 148, second paragraph. Should be corrected to read rabbit developmental study rather than rabbit reproduction study.

DPR RESPONSE: Corrected.

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Again, thank you for reviewing this document and we hope that our corrections are along the lines of your recommendations. If there are further questions, comments or suggestions, please contact Dr. Marilyn Silva (916-324-3482)(primary reviewer), or Dr. Joyce Gee (916-324-3465).

APPENDIX H

Endosulfan. Department of Pesticide Regulation Response to the Endosulfan Task Force Comments on California's Endosulfan Risk Characterization Document of December 5, 2006.



Department of Pesticide Regulation



Mary-Ann Warmerdam
Director

Arnold Schwarzenegger
Governor

DATE: May 25, 2007

TO: Gary T. Patterson, Ph.D., Chief
Medical Toxicology Branch
Department of Pesticide Regulation
California Environmental Protection Agency
1001 I Street, P.O. Box 4015
Sacramento, California 95812-

FROM: Marilyn Silva, Ph.D., D.A.B.T., Toxicologist
Medical Toxicology Branch,
Department of Pesticide Regulation,
California Environmental Protection Agency

VIA: Joyce Gee, PhD., Senior Toxicologist,
Medical Toxicology Branch,
Department of Pesticide Regulation,
California Environmental Protection Agency

SUBJECT: Endosulfan. Department of Pesticide Regulation Response to the Endosulfan Task Force Comments on California's Endosulfan Risk Characterization Document of December 5, 2006.

This document was generated to respond to the February 18, 2007 comments generated by the Endosulfan Task Force.

Nature and Severity of Effects

Endosulfan Task Force COMMENT:

CDPR states (pages viii to ix):

Endocrine Disruption: Effects to testes and reproductive tract occurred at lower doses in prepubertal and neonatal rats than in adults following repeat exposures. The observations were from studies in the open literature (not FIFRA Guideline studies) and they occurred at doses greater than those that induced neurotoxicity. Due to these results, the US EPA considers endosulfan to be a potential endocrine disruptor. It is notable, however, that the developmental neurotoxicity study, recently received and reviewed by DPR showed no indication of neurotoxicity or endocrine disruption in rats treated with endosulfan in diet during both pre- and post-natal development. Dams, fetuses and pups showed a decrease in body weight during treatment and male pups had a slight delay (4-5%) in preputial separation at 10.8 mg/kg/day and greater.



We concur that the recent GLP DNT study (Gilmore et al. 2006) shows no potential for endocrine disruption (maternal MOAEL = 3.74 mg/kg/day; developmental neurotoxicity NOAEL = 29.8 mg/kg/day). We also note that the effects cited by EPA and CDPR from open literature (not FIFRA guideline studies) to support concern for endocrine disruption run counter to the conclusions of GLP studies. USEPA, in setting the FOPA, relied on these studies without critical analysis and, we believe, relied on these studies in error. Our comments to OEHHHA (Sargent 2006) note that caution should be exercised when relying on these studies. This document is appended. In view of the new DNT study and other existing reliable data, the ETF has concluded that there is no evidence of enhanced susceptibility to younger animals, and the data do not demonstrate a potential for endocrine disruption in males or females. The assessment by EPA's FQPA Safety Factor Committee of a 10x is excessive and not justified. Concerning the overall weight-of-evidence, it is prudent to rely on acceptable guideline studies before using the open literature data that might not meet EPA's standard acceptance criteria and are often not reproducible. Therefore, we would appreciate if CDPR would not follow EPA's assessment and would take the time to reconsider using the 10x FOPA Safety Factor in its own assessment.

DPR RESPONSE: In a personal communication with USEPA, they have stated that they are in the process of re-evaluating their FQPA safety factors. DPR will defer to the USEPA decision regarding FQPA safety factors but will continue to use the 10x SF until USEPA has reported the results of the re-evaluation. Table 1 below reflects the status of the endpoint selections for DPR and USEPA.

Table 1. Comparison of critical no-observed-effect levels (NOELs) and endpoints for risk characterization between the Department of Pesticide Regulation and U.S. Environmental Protection Agency

DPR NOELs and Endpoints for Risk Characterization		
Exposure/ Species	NOEL	Endpoint
Developmental, rabbit ^a Acute Oral	0.7 mg/kg/day UF = 100 ^a FQPA SF = 10	LOEL = 1.8 mg/kg; Abortions, death, convulsions, neurotoxic signs immediately after dosing, GD6 (Fung, 1981 a & b) RfD = 0.007 mg/kg/d ^c ; aPAD = 0.0007 mg/kg/d ^a
21 day Inhalation, rat ^b For Acute Inhalation	0.194 mg/kg UF Interspecies= 10 UF Intraspecies= 10	Decreased body weight gain & lymphocyte counts in males; increased creatinine values in females at 0.4 mg/kg/day (LOAEL)(Hollander et al., 1984) RfC = 0.0033 mg/m ³ (0.0002 ppm) ^d
Reproduction, rat ^b Subchronic Study	1.18 mg/kg/day UF Intra/Interspecies= 100	Increased kidney and liver weights; decreased food consumption and body weights (Edwards et al., 1984)
21 day Inhalation, rat ^b Short (1-30 d); Intermediate (1-6 mo)	0.194 mg/kg/day UF Interspecies= 10 UF Intraspecies= 10	Decreased body weight gain & lymphocyte counts in males; increased creatinine values in females at 0.4 mg/kg/day (LOAEL)(Hollander et al., 1984) RfC = 0.0033 mg/m ³ (0.0002 ppm) ^d
1 year dog ^c Chronic dietary Study (all populations)	0.57 mg/kg/day UF = 100 FQPA SF = 10	LOEL = 2.09 mg/kg/d; Premature deaths, neurotoxicity; dec bw gain & food consumption (Brunk, 1989); RfD = 0.0057; cPAD = 0.00057 mg/kg/d
21 day Inhalation, rat ^c For Chronic Inhalation ^e	ENEL = 0.0194 mg/kg/day UF Inter/Intraspecies= 100 UF Subchron - Chronic=10 ^e	Dec body wt gain & lymphocyte counts in males; increased creatinine values in females at 0.04 mg/kg/day (ENEL)(Hollander et al., 1984) RfC = 0.00033 mg/m ³ (0.00002 ppm) ^d cPAD = 0.000033 mg/m ³
USEPA NOELs and Endpoints for Risk Characterization^f (USEPA, 2002a)		
Acute Study Neurotoxicity, rat ^a	1.5 mg/kg/day UF = 100 FQPA = 10	LOAEL = 3 mg/kg/day; Increased convulsions in females within 8 hrs after dosing (Bury, 1997) Acute RfD = 0.015 mg/kg/day; a PAD = 0.0015 mg/kg/day (under review)
21 day Dermal, rat ^b Short-term/Subchronic	12 mg/kg/day UF Interspecies = 10 UF Intraspecies = 10	Mortality in females at 27 mg/kg/day (Ebert et al., 1985a).
21 day Inhalation, rat ^b Short-term/Subchronic	0.2 mg/kg/d (0.001 mg/L) UF Interspecies = 10 UF Intraspecies = 10	Decreased body weight gain & lymphocyte counts in males; increased creatinine values in females at 0.4 mg/kg/day; LOAEL = 0.002 mg/L (0.4 mg/kg/day) (Hollander et al., 1984)
104 week dietary, rat ^c Chronic	0.6 mg/kg/day UF = 100 FQPA = 10	Decreased body weight gain, enlarged kidneys, increased progressive glomerulonephrosis; blood vessel aneurysms (Ruckman et al., 1989). Chronic RfD = 0.006 mg/kg/day; cPAD = N/A, currently under review

a - Acute RfD = acute NOEL ÷ UF 10x (interspecies) x UF 10x (intraspecies); Population Adjusted Dose (aPAD = RfD ÷ 10x FQPA safety factor)

b - Subchronic, seasonal (intermediate/short-term) exposure RfD= Subchronic NOEL ÷UF (10 interspecies x 10 intraspecies); RfC = Subchronic NOEL (also used for Acute inhalation NOEL)) UF (10 interspecies x 10 intraspecies)

c - Chronic RfD = Chronic NOEL ÷ (UF 10 interspecies) x (UF 10 intraspecies)); Population Adjusted Dose (cPAD = RfD)) 10x FQPA safety factor); A 10x UF is added to the subchronic inhalation NOEL to extrapolate to obtain a chronic inhalation NOEL; ENEL = (Subchronic ÷NOEL) ÷ UF (10 interspecies x 10 intraspecies)

d - Human inhalation NOEL (mg/m³) = animal inhalation NOEL (mg/kg/day)) respiratory rate_{human} (m³/kg) NOTE: The respiratory rate used for humans was for children (0.59 m³/kg) who are considered to be the highest risk group; RfC (mg/m³) = human inhalation NOEL (mg/m³) ÷(UF 10 interspecies x UF 10 intraspecies); RfC (ppm) = RfC (mg/m³) x (M. Vol (@ 25°C))(M.Wt. (406.9g)); Population Adjusted Dose (cPAD = RfD) 10x FQPA safety factor)

e - RfC = (Subchronic NOEL) 10 extrapolation factor)) UF (10 interspecies x 10 intraspecies)

f – The endpoints, definitive studies and critical NOELs are those published in the REREGISTRATION ELIGIBILITY DOCUMENT (USEPA, 2002). USEPA is currently re-evaluating some of their endpoints and when DPR receives the updated information it will be included in the RCD.

Note: See Section VII. REFERENCE DOSES/CONCENTRATION

Reported Illnesses (page 3 to 5)

Endosulfan Task Force COMMENT:

CDPR states (page 4, Table 1):

Illnesses Reported in California Associated with Endosulfan Exposure, 1992-2003): summarizes types of symptoms reported in association with endosulfan exposure. Of the seven illnesses and injuries attributed solely to endosulfan (1992 - 2003), one occurred as the result of exposure to field residues, three resulted from handling processes (mix/load, apply), two resulted from drift, and one followed a nonspecified exposure. Of the 55 illnesses resulting from exposure to endosulfan in combination with other pesticides, 42 occurred as the result of exposure to residue, six occurred during the application process (mix/load, apply, flag), and seven occurred as the result of drift exposure.

For illnesses where endosulfan was the sole pesticide involved, systemic effects were observed in four cases (two of which also had skin and eye involvement), while skin and eye effects occurred in three cases. In cases where endosulfan was used or encountered along with other pesticides, 27 people developed systemic symptoms (some also involved skin and eye effects), while 28 involved only skin and eye effects.

These data clearly demonstrate that the frequency of endosulfan related incidents is relatively low and the severity of the effects is minor (no hospitalization). This was also demonstrated by EPA's review (USEPA 2002), where among all the pesticide related illness reports for each active ingredient, endosulfan ranked 61st in California as a cause of systemic poisoning (California PISP 1982 - 1996), and nationwide endosulfan ranked as 65th (NPTN 1984 - 1991). Most of these incidents were related to worker field activities coming in substantial contact with foliage during harvesting, less from handling the product or spray drift exposure. However, the new mitigation measures (e.g. RUP statement, lower rates, additional PPE, extended REI and PHI, "closed mixing/loading system", "enclosed cab") that took effect after the RED was issued in 2002, should further reduce the risk of endosulfan regarding any potential poisoning cases or incidents.

Key toxicological endpoints and NOAELs established for risk assessment (page 4 of 10)

Acute RfD (aRfD):

CDPR states (Table 42, page 140):

CDPR notes that a developmental study in rabbits is used for establishing the acute RfD that has a NOEL of 0.7mg/kg bw/day, based on clinical signs and deaths at 1.8 mg/kg bw/day (Nye 1981).

aRfD: $(0.7 \text{ mg/kg bw/day} / 100 \text{ UF}) = 0.007 \text{ mg/kg bw/day}$

aPAD: $(\text{aRfD}) / 10\text{x FQPA} = 0.0007 \text{ mg/kg bw/day}$

USEPA cites the acute neurotoxicity study for the basis for the NOEL (1.5 mg/kg bw/day) based on increased convulsions at 3 mg/kg bw/day.

aRfD: $1.5 \text{ mg/kg bw/day} + 100 \text{ UF} = 0.015 \text{ mg/kg bw/day}$

aPAD: $(\text{aRfD}) / 10\text{x FQPA} = 0.0015 \text{ mg/kg bw/day}$

Endosulfan Task Force COMMENT:

While all of the studies referenced by CDPR provide information regarding the acute toxicity of endosulfan, the ETF believes that the most appropriate study for establishing an acute toxicity endpoint (aRfD) for risk assessment should be the acute neurotoxicity study (Bury 1997). This guideline study is designed specifically to assess all aspects of neurotoxicity and uses testing batteries that correlate appropriate clinical signs in making a determination of neurotoxic versus other nonspecific systemic type effects. Since endosulfan is an insecticide whose main mode of action is neurotoxicity (see above), the acute neurotoxicity study evaluated the range of clinical signs of neurotoxicity at the time to peak effect from a single dose.

In addition, while the effects noted in dams in the rabbit teratology study at the higher doses should be considered in the weight-of-evidence, a single clinical observation (e.g. hyperactivity) in the absence of other evidence of toxicity is not sufficient to establish an acute neurotoxic effect level. This position is also supported in EPA's review of the endosulfan acute toxicity data:

The database included a lower NOAEL (maternal) of 0.7 mg/kg/day in the rabbit developmental toxicity study (MRID# 00094837), based on salivation, convulsions, rapid breathing, and hyperactivity seen at 1.8 mg/kg/day. The Committee, however, decided not to use this NOAEL for this (acute) scenario because the clinical signs in the dams were seen on day 10 of gestation (i.e., after 4 treatments), whereas in the acute neurotoxicity study, convulsions were seen 8 hours after a single oral dose, thus making this endpoint more appropriate for this risk assessment" (US EPA 2000).

Based on this information, the ETF recommends in agreement with EPA that the acute neurotoxicity study should be used to establish the acute toxicity effect level for human health risk assessment (NOAEL of 1.5 mg/kg/day). In addition the ETF request removal of the 10X FQPA Safety factor based on the results from the DNT study (see above), and request to change the aPAD to 0.015 mg/kg bw/day.

In contrast, CPDR does note that the rabbit developmental study was a repeat dose study but supported their selection of 0.07 mg/kg bw/day as the appropriate NOEL since effects were noted after one dose.

DPR RESPONSE: DPR selected the developmental neurotoxicity study for the critical oral NOEL because there were no major deficiencies and it provided the lowest acute oral NOEL. Similar effects were observed in 2 rangefinding studies also performed in pregnant New Zealand rabbits (Fung, 1981a, b). In these studies the LOELs were 1.0 mg/kg/day, based on neurotoxicity and deaths beginning day 8 of gestation (treatment day 2). The other studies described in the RCD (summarized in Table 2, below), showed that female rats are more sensitive to acute oral endosulfan treatment than are males and that pregnant female rabbits are more sensitive to endosulfan than are both non-pregnant and pregnant rats. Although the rabbit developmental study involved multiple dosing, rather than a single acute oral dose of endosulfan,

the neurotoxic effects were seen on the first day of treatment and were therefore acute oral effects. Therefore, this study, with a critical NOEL of 0.7 mg/kg, was selected as the definitive study for evaluating acute dietary exposure and to calculate the MOE for potential acute single-day (non-inhalation) human exposures to endosulfan. While the acute neurotoxicity in rat study was designed specifically to test for acute neurotoxicity, the rabbit proved to be the more sensitive species.

Table 2. The Acute Effects of Endosulfan and the NOELs and LOELs

Species	Exposure	Effect	NOEL mg/kg	LOEL mg/kg	Ref ^a
ORAL					
Rat ^b Male	Single Gavage	Death, clinical signs, irritation of stomach and small intestine; congestion of kidneys, lungs and adrenals, LD ₅₀ = 48 mg/kg	--	31.6	1
Rat ^b Female	Single Gavage	Death, clinical signs, reddening of small intestine, LD ₅₀ = 10 mg/kg	--	6.3	2
Rat M/F	Single Gavage	Death, clinical signs, neurotoxicity	M 12.5 F 1.5	M 25 F 3.0	3*
Rat Female	8 Days Gavage	Dams: Death, decreased body weight, clinical signs Fetuses: Increased anomalies and malformations	2.0	6.0 HDT	4
Rabbit Female	12 Days Gavage	Death, clinical signs beginning the first day of treatment	0.7	1.8 HDT	5*
DERMAL					
Rabbit ^{b, c}	Single Dermal	Death, erythema, atonia, slight desquamation, hemorrhagic lungs, granular livers, irritation of large intestine, congested kidneys (clinical signs not described) LD ₅₀ = 359 mg/kg	--	46.4	6
INHALATION					
Rat ^{b, d} M/F	Single 4 Hour Nose Only	Death, clinical signs	--	0.567	7

a - 1. Scholz and Weigand, 1971a; 2. Scholz and Weigand, 1971b; 3. Bury, 1997; 4. Fung, 1980b; 5. Nye, 1981; 6. Elsea, 1957; 7. Hollander and Weigand, 1983

b - LD₅₀/LC₅₀ study

c - Gender unspecified

d - For information on this study, see RCD Subchronic Inhalation

* - Designates studies that are acceptable, according to FIFRA Guidelines. HDT = Highest Dose Tested

Bold = Definitive test for the critical NOEL.

Subchronic, seasonal (intermediate) occupational exposure

Endosulfan Task Force COMMENT:

CDPR states (Table 42, pages 66 and 140):

Two NOELs are noted: 1.18 mg/kg bw/day based on increased kidney and liver weights and decreased food intake and body weights in a rat reproduction (oral) study (Edwards et al., 1984) and 0.2 mg/kg bw/day based on decreased body weight gain and lymphocyte counts in males and

increased creatinine values in females at 0.4 mg/kg bw/day at 0.4 mg/kg bw/day in a 21-day rat inhalation study (Hollander and Weigand 1984).

Subchronic RfD_{oral} 1.18 mg/kg bw/day /100 UF = 0.018 mg/kg bw/day

USEPA cites two NOELs: 12.0 mg/kg bw/day, based on mortality in females at 27 mg/kg bw/day in a repeat dose 21-day dermal study in rats (Ebert et al., 1985) and 0.2 mg/kg bw/day, as noted above (Hollander et al., 1984) for short- and intermediate-term inhalation.

Sub chronic RfD_{dermal} 12 mg/kg bw/day / 100 UF = 0.12 mg/kg bw/day

Subchronic RfD_{inhalation}: 0.2 mg/kg bw/day / 100 UF = 0.002 mg/kg bw/day

We believe that occupational risk assessments based on NOAELs from appropriate dermal toxicity studies, rather than based on oral toxicity studies that are then adjusted by an estimated dermal penetration factor in this case 47.3%, are more accurate and appropriate to use. For endosulfan occupational risks, an appropriate dermal study in rabbits is available and has been used by the USEPA for their occupational risk assessments. Therefore, the ETF asks that DPR revise their occupational risk assessments to change the NOAEL basis from the oral to the dermal study.

DPR RESPONSE: According to the current revision of USEPA'S risk assessment document for endosulfan, the following studies are being used for dermal short term and long term exposure estimates (see Table 1 of this document; USEPA, 2002):

Dermal Short-term and Subchronic Studies--Dermal Rat: NOEL = 12 mg/kg/day (45% Dermal absorption), Ebert et al., 1985.

Occupational LOC/MOE = 100

DPR did not establish a subchronic dermal endpoint, since there were no acceptable studies.

For seasonal occupational (dermal), subchronic swimmer in surface water and combined (Total Occupational + Dietary) MOE estimates, DPR used a rat reproduction dietary study (Edwards et al., 1984) with a NOEL of 1.18 mg/kg/day based on increased kidney weights, decreased food consumption, and decreased body weights for MOE estimates. A dermal absorption of 47.3% (Craine, 1988) from a dermal rat study was used in the DPR exposure assessment (Beauvais, 2006). The USEPA did not establish a subchronic dietary endpoint study.

Subchronic inhalation toxicity endpoint

Endosulfan Task Force COMMENT:

CDPR states (page 67):

"... This study was therefore selected as the definitive study (Hollander et al. 1984) for the critical NOEL of 0.194 mg/kg/day..."

The ETF does not believe that an inhalation endpoint is the most appropriate for human health risk assessment. In regard to the determination of a subchronic inhalation toxicity endpoint for risk assessment, the ETF does not concur with CDPR's selection of the NOEL of 0.194 mg/kg/day from the 21-day inhalation study (Hollander et al., 1984, MRID# 00147183). EPA selected a NOEL of 0.24 mg/kg/day from the study (USEPA 2000). In this study, the low concentration (0.0024 mg/L) and high concentration (0.0065 mg/L) groups received airborne particles that were primarily below 6 µm in diameter. Roughly 92 to 98 percent of the particles were below 6 µm in diameter in the case of the low concentration group and approximately 88 to 90 percent of the particles delivered to the test animals in the high concentration group were less than 6 µm in diameter. The results of this study may not be directly applicable to assessing the risk associated with worker exposures because workers are exposed primarily to a size range of larger diameter particles in the field due to use of standard application equipment. By comparison, standard agricultural spray equipment, such as airblast, ground boom and aerial spray rigs, generate relatively coarse aerosol sizes. More than 90 percent of the mass of particulates generated by agricultural application equipment are greater than 30µm in diameter (Ross et al. 2001). Thus, no more than 10 percent of the total applied mass consists of aerosols that would be in the respirable range (i.e., less than 10µm in diameter). Most of the aerosols contacting the breathing zone of the applicator would be removed by the specified respirator with an approved pre-filter that is required for all mixer/loaders and applicators of endosulfan WP and EC formulations where an enclosed cab is not involved. Particles of these larger diameters generated in the field that could possibly by-pass the respirator (e.g., in cases where less than ideal fit is obtained) would be expected to become inhaled and impacted in the upper respiratory tract, after which they would be rapidly cleared and swallowed, thus, becoming an oral dose. For this reason, Ross et al., (2001) recommends that in assessing pesticide handler inhalation risk, the inhalation exposure estimate should be compared to an oral NOAEL. Therefore, it seems to be more appropriate to use, the NOAEL of 1.5 mg/kg/day from the acute oral neurotoxicity study (Bury 1997) for assessing short-term inhalation exposures to handlers (i.e., mixer/loaders, applicators, flaggers; see also (Whitmyer 2001).

We would like to reiterate that since the RED has been published, new mitigation measures are being implemented (RUP classification, reduced use rates, extended REIs and PHis, additional PPEs, "closed mixing/loading system", "enclosed cab"). We request that CDPR would consider these changes and revise the endosulfan risk assessment accordingly.

DPR RESPONSE: USEPA uses the same NOEL for the rat inhalation study, as does DPR (see Table 1, above).

In a seminar presented by Ayaad Assaad, John C. Redden, and John E. Whalen entitled "Inhalation Toxicology and Risk Assessment" a slide was presented that specifically addressed the issue of inhaled particle size. They ask: "Why do we require MMAD of 1-4 µm in rodent studies when we know humans are exposed to much larger particles?"

The slide contains 4 statements in response to this question. These are paraphrased below:

1) Rodents are obligate nose breathers, and their nasal airways are very efficient at removing inhaled particles.

- 2) Because of this, a range of particles exists in which particles are small enough to reach the human lung but are captured in the rodent nose.
- 3) To simulate human exposure, rodents are exposed to MMAD 1-4 μm particles to assure that particles will reach their lungs.
- 4) Sprayed particles, e.g. from a crop duster, may be 100-500 μm when sprayed, but due to evaporation their sizes decrease to the range of inhalable and respirable particles.

In addition to this, it is the policy of DPR to use inhalation studies when available and FIFRA Guideline acceptable for estimates of exposure (with the standard conversion factors). In light of the fact that endosulfan might be considered to be a toxic air contaminant, the availability of an acceptable inhalation study is useful.

Chronic RfD (cRfD):

Endosulfan Task Force COMMENT:

CDPR states (Table 42, page 140): The NOAEL of 0.57 mg/kg bw/day is based on premature deaths and neurotoxic effects (e.g, violent contractions of the upper abdomen) in a one year dog study (oral by capsule) at 2.09 mg/kg bw/day (Brunk 1989).

cRfD: 0.0057 (NOEL /100 UF); cPAD: 0.00057 (cRfD /FQPA 10x UF)

USEPA uses a NOAEL of 0.6 mg/kg bw/day based on a chronic rat study based on decreased body weight, enlarged kidneys in females, increased progressive glomerulonephritis in females and blood vessel aneurysms in males (Ruckman et al. 1989).

cRfD: 0.006 mg/kg bw/day; cPAD: 0.0006mg/kg bw/day

We do not concur with the respective chronic RfDs used by CPDR and USEPA by means of the additional 10X FOPA safety factor, since the new DNT study demonstrated that there is no evidence of enhanced susceptibility to younger animals, and the data do not demonstrate a potential for endocrine disruption in males or females. Therefore, the appropriate cPAD should be 0.006 mg/kg bw/day, instead of 0.0006 mg/kg/day.

Uncertainty Factors:

DPR states: The uncertainty factor for occupational risk is 100, generally, but 1000 for infants and children (Risk Characterization, page 132). Generally an MOE of at least 100 is considered sufficiently protective of human health when the NOEL for an adverse systemic effect is derived from an animal study. This MOE allows for the possibility of humans being 10 times more sensitive than animals and for a 10-fold variation in sensitivity between the lower range of the normal distribution in the overall population and the sensitive subgroup (Dourson et al., 2002). However, when considering endosulfan exposure for the general public, specifically infants

exposed in ambient air or as bystanders, the above MOE of 100 is insufficient. For infants and children exposed in ambient air or as bystanders, MOEs need to be at least 1000-fold or greater. MOEs of less than 1000 for these scenarios result in the consideration of listing endosulfan as a toxic air contaminant (TAC, 2001) based on acute, subchronic and chronic toxicity.

ETF COMMENT: We believe that a MOE of 100, based on a 100-fold uncertainty factor, is sufficient for protection of the population, including infants and children. JMPR in their draft evaluation of endosulfan also use a 100-fold uncertainty factor (McGregor 1998).

The open literature studies that, in large measure, support EPA's 10-fold FQPA uncertainty factor are non-GLP, have issues associated with them, and have been rebutted (Sargent 2006). In addition, the DNT study has been completed, does not show neurotoxic or endocrine effects (as reviewed by cPDR) and fills the data gap that was cited by USEPA as supporting the 10x FQPA uncertainty factor.

DPR RESPONSE: Currently USEPA is revising their FQPA safety factor for their chronic exposure (oral) (see Table 1, above). DPR will continue to use the 10x safety factor until USEPA has concluded the re-evaluation of its FQPA decision.

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